



State of Oregon  
Department of  
Environmental  
Quality

Permit Number: 31-0006-TV-01

Expiration Date: 12/01/2021

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

Eastern Region  
475 NE Bellevue Drive, Suite 110  
Bend, OR 97701

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

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ISSUED TO:

Boise Cascade Wood Products, L.L.C.  
1917 Jackson Ave.  
La Grande, OR 97850-3748

INFORMATION RELIED UPON:

Application Number: 28547  
Received: 2/29/2016

PLANT SITE LOCATION:

Elgin Complex  
90 South 21<sup>st</sup> Street  
Elgin, OR 97827

LAND USE COMPATIBILITY STATEMENT:

Issued by: City of Elgin  
Dated: 08/08/1995

ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY

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

Dec. 5, 2016  
Date

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<u>Nature of Business</u>	<u>SIC</u>	<u>NAICS</u>
Sawmill and planing mill	2421	321113
Softwood veneer and plywood	2436	321212
Fuel burning equipment	4961	221330

RESPONSIBLE OFFICIAL

Title: Region Manager

FACILITY CONTACT PERSON

Name: Bart Barlow  
Title: Region Environmental Engineer  
Phone: 541-962-2057

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

ACDP	Air Contaminant Discharge Permit	I&M	Inspection and Maintenance
Aet	Federal Clean Air Act	NA	Not Applicable
ASTM	American Society of Testing and Materials	NO <sub>x</sub>	Nitrogen Oxides
Btu	British thermal unit	O <sub>2</sub>	Oxygen
CFR	Code of Federal Regulations	OAR	Oregon Administrative Rules
CO	Carbon Monoxide	ODEQ	Oregon Department of Environmental Quality
CO <sub>2</sub> e	Carbon Dioxide Equivalent	ORS	Oregon Revised Statutes
CPMS	Continuous Parameter Monitoring System	O&M	Operation and Maintenance
DEQ	Department of Environmental Quality	Pb	Lead
dscf	Dry standard cubic feet	PCD	Pollution Control Device
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
GHG	Greenhouse Gas	psia	pounds per square inch, actual
gr/dscf	Grain per dry standard cubic feet (1 pound = 7000 grains)	SERP	Source Emissions Reduction Plan
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040	SO <sub>2</sub>	Sulfur Dioxide
HCFC	Halogenated Chloro-Fluoro-Carbons	ST	Source Test
ID	Identification Number or Label	VE	Visible Emissions
		VMT	Vehicle Miles Traveled
		VOC	Volatile Organic Compounds

**PERMITTED ACTIVITIES**

1. Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from those processes and activities directly related to or associated with air contaminant source(s) in accordance with the requirements, limitations and conditions of this permit. [OAR 340-218-0010 and 340-218-0120(2)]
2. All conditions in this permit are federally enforceable, meaning that they are enforceable by DEQ, EPA and citizens under the Clean Air Act, except Conditions 6, 7, 8, 54.e, 54.f, G5 and G9 (OAR 340-248-0005 through 340-248-0180) are only enforceable by the state. [OAR 340-218-0060]

**EMISSIONS UNIT (EU) AND POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION**

3. The emissions units regulated by this permit are the following: [OAR 340-218-0040(3)]

**Table 1 Emission Unit/Pollution Control Device Description**

Emissions Unit Description	EU ID	Device Description	Device ID	Pollution Control Devices	
				Description	PCD ID
Boilers	B-1	Hogged wood/bark fired boiler	Boiler 1	Multiclones 1 & 2 Dry Electrostatic Precipitator 1	MC-1
	B-2	Hogged wood/bark fired boiler	Boiler 2		MC-2 DESP-1
Veneer Drying	VD	Veneer dryer	Dryer 1	Regenerative Catalytic Oxidizer	RCO-1
		Veneer dryer	Dryer 2		
		Veneer dryer	Dryer 3		
Press Vents	P-O	Presses 1 & 2 (pre 1970)	P1, P2	None	NA
	P-N	Press 3 (post 1970)	P3		
Kilns	K-O	Kilns 1-4 (pre 1970)	K1, K2, K3, K4	None	NA
Material Handling	CYC-N	Planer (post 1970)	Cyclone 1	Baghouse	BH #1
	CYC-O	Planer trim	Cyclone 2	None	NA
		Filing room grit	Cyclone 3		
		Fuel house	Cyclone 4		
		Planer	Cyclone 5		
	CYC-N	Plywood (post 1970)	Cyclone 15	Baghouse	BH #15
			Cyclone 16		
			Cyclone 17		
		Plywood chipper screen fines	Target Box 9	None	NA
Log Sawmill Sawing & Debarking	S&D	Saws and debarkers	SD	None	NA
Chippers	CHP	Re-chipper and mobile chipper	CHP	None	NA
Storage Piles	SP	Storage piles	SP	None	NA
Unpaved Roads	UPR	Unpaved roads	UPR	Watering	NA
Fire Pump Engine	ENG	Cummins 208 hp (gross) IC engine	ENG	None	NA
Aggregate Insignificant	AI	Target boxes, Paved roads, Cyclones C18-C23 and fire pump	AI	None	NA



**EMISSION LIMITS AND STANDARDS**

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

**Facility-Wide Requirements****Table 2 Facility-Wide Requirements**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
340-208-0210	4	Fugitive emissions	Minimize	NA	NA	5
340-208-0300	6	Nuisance	No nuisance	NA	NA	8
340-208-0450	7	PM <sub>&gt;250µ</sub>	No fallout	NA	NA	8
340-228-0110(1)	9.a	#1 Distillate oil sulfur content	≤0.3% by weight	Each shipment	NA	10
340-228-0110(2)	9.b	#2 Distillate oil sulfur content	≤0.5% by weight	Each shipment	NA	10
40 CFR Part 68	11	Risk management	Risk management plan	NA	NA	11

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.

- 4.a. Such reasonable precautions include, but are not limited to the following: [OAR 340-208-0210]
- 4.a.i. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
  - 4.a.ii. Application of water, or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;
  - 4.a.iii. Full or partial enclosure of materials stockpiles in cases where application of water or chemicals are not sufficient to prevent particulate matter from becoming airborne;
  - 4.a.iv. Installation and use of hoods, fans and fabric filters to enclose and vent the handling of dusty materials;
  - 4.a.v. Adequate containment during sandblasting or other similar operations; and
  - 4.a.vi. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne.
- 4.b. Upon request by DEQ, the permittee must develop a fugitive emission control plan for approval by DEQ if the above precautions are not adequate, and implement the plan whenever fugitive emissions leave the property for more than 18 seconds in a six minute period. [OAR 340-208-0210(3)]

5. ~~Monitoring Requirement:~~ At least once each week for a minimum period of 30 minutes, the permittee must visually survey the plant for any sources of excess fugitive emissions. For the purpose of this survey, excess fugitive emissions are considered to be any visible emissions that leave the plant site boundaries for more than 18 seconds in a six minute period. The person conducting the observation must follow the procedures of EPA Method 22. If sources of visible emissions are identified, the permittee must:
- 5.a. Immediately take corrective action to minimize the fugitive emissions, including but not limited to those actions identified in Condition 4; or
  - 5.b. Develop a DEQ approved fugitive emission control plan upon request by DEQ and implement the plan whenever fugitive emissions leave the property for more than 18 seconds in a six minute period.
  - 5.c. ~~Recordkeeping Requirement:~~ The permittee must maintain records of the fugitive emissions surveys and corrective actions, if necessary.

#### Nuisance Conditions

6. ~~Applicable Requirement:~~ The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by DEQ personnel. [OAR 340-208-0300] This condition is enforceable only by the State.
7. ~~Applicable Requirement:~~ The permittee must not cause or permit the deposition of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. [OAR 340-208-0450] This condition is enforceable only by the State.
8. ~~Monitoring Requirement:~~ The permittee must maintain a log of each nuisance complaint received by the permittee during the operation of the facility. Documentation must include date of contact, time of observed nuisance condition, description of nuisance condition, location of receptor, status of plant operation during the observed period, and time of response to complainant. A plant representative must immediately investigate the condition following the receipt of the nuisance complaint and a plant representative must provide a response to the complainant within 24 hours, if possible. This condition is enforceable only by the state. [OAR 340-218-0050(3)(a)]

#### Sulfur Content of Fuel Oil

9. ~~Applicable Requirement:~~ The permittee must not burn any fuel other than hogged fuel and ASTM grade 1 and 2 fuel oils. The fuel oils must not contain more than:
- 9.a. 0.3% sulfur by weight for ASTM Grade 1 distillate oil; [OAR 340-228-0110(1)]
  - 9.b. 0.5% sulfur by weight for ASTM Grade 2 distillate oil; [OAR 340-228-0110(2)]
10. ~~Monitoring Requirement:~~ The permittee must monitor the sulfur content of each shipment of fuel received by: [OAR 340-218-0050(3)(a)]
- 10.a. Obtaining a sulfur content certificate from each vendor for each shipment of fuel received; or
  - 10.b. Analyzing or having analyzed by a contract laboratory a representative sample taken by the permittee from each shipment of fuel received.

#### Accidental Release Prevention

11. ~~Applicable Requirement:~~ Should this stationary source become subject to the accidental release prevention regulations in 40 CFR Part 68, then the permittee must submit a risk management plan (RMP) by the date specified in 40 CFR 68.10 and comply with the plan and all other applicable Part 68 requirements. [40 CFR Part 68]

**Emissions Unit Requirements:****Table 3 Emission Unit Requirements**

EU-ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	
					Method	Condition
Boilers (B-1 & B-2)	340-208-0110(6)	12	Visible emissions	20% opacity, 6-minute block average	COMS	20
	340-228-0210(2)(b)(A)	13	PM	0.10 gr/dscf @12%CO <sub>2</sub> , avg. of 3 test runs	ST periodic monitoring	22, 23
	40 CFR 63.7500(a)(1)	14.a.i	Filterable particulate	0.037 lb/MMBtu heat input, or 0.043 lb/MMBtu steam output	Tune-up, energy assessment, operating load	14.f, 14.g, 16
		14.a.ii	or Total selected metals	2.4E-04 lb/MMBtu heat input, or 2.8E-04 lb/MMBtu steam output	Operating load or fuel analysis	16, 19
		14.b	Carbon Monoxide	1,500 ppmv, dry @ 3% O <sub>2</sub> or 1.4 lb/MMBtu steam output	Tune-up, oxygen trim system	14.f, 21
		14.e	Mercury	5.7E-06 lb/MMBtu heat input, or 6.4E-06 lb/MMBtu steam output	Operating load or fuel analysis	16, 19
		14.d	HCl	0.022 lb/MMBtu heat input, or 0.025 lb/MMBtu steam output	Operating load or fuel analysis	16, 19
		14.f	Tune-up	Once every 5 years	Record-keeping	24.j
		14.g	Energy Assessment	One-time	Record-keeping	66
	40 CFR 63.7500(a)(2)	15	Visible emissions	10% opacity, daily block average	COMS	20
	40 CFR 63.7500(f)	17	Startup/Shutdown	Fuel limitations during startup	Record-keeping	24.d
Veneer Drying (VD)	340-234-0510(1)(b)	25	Visible emissions	10% average 20% maximum	O & M monitoring	27, 29
	0AR 340-226-0210(2)(b)(A)	26.a	Particulate	0.10 gr/dscf	O&M Monitoring	26.b, 26.e, 27, 29
	40 CFR 63.2240(b)	30	Total HAP emissions	Reduce by 90%	O&M Monitoring	33
	40 CFR 63.2250(e)(3)	31	RCO Temp	>780°F 3-hour block average	Temperature monitor	33, 34
	40 CFR 63.2241(a)	32	VD Fugitives	Minimize	O&M Monitoring	27.b

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	
					Method	Condition
Press Vents (P-O)	0AR 340-208-0110(3)(a)	38	Visible Emissions	40% through 12/31/19 20% after 1/1/20	VE Periodic Monitoring	39
	0AR 340-226-0210(2)		Particulate	0.10 gr/dscf		
Press Vents (P-N)	0AR 340-208-0110(4)		Visible Emissions	20%		
	0AR 340-226-0210(2)		Particulate	0.10 gr/dscf		
Kilns (K-O)	0AR 340-208-0110(3)(a)	41	Visible Emissions	40% through 12/31/19 20% after 1/1/20	VE Periodic Monitoring	42
	0AR 340-226-0210(2)(a)(B)		Particulate	0.24 gr/dscf through 12/31/19 0.15 gr/dscf after 1/1/20		
Material Handling (CYC-O)	0AR 340-208-0110(3)(a)	44.a	Visible Emissions	40% through 12/31/19 20% after 1/1/20	VE Periodic Monitoring	45, 46
	0AR 340-226-0210(2)(a)(B)	44.b	Particulate	0.24 gr/dscf through 12/31/19 0.15 gr/dscf after 1/1/20		
Material Handling (CYC-N)	0AR 340-208-0110(4)	44.e	Visible Emissions	20% opacity		
	0AR 340-226-0210(2)(b)(B)	44.d	Particulate	0.14 gr/dscf		
Press, Mat'l Handling (P-O, P-N, CYC-N (cyclones 14-17))	0AR 340-234-0510(2)	48	Particulate	65 lb/hr	Record-keeping	49
Engine (ENG)	40 CFR 63.6602	50	HAP	Required Maintenance	Record-keeping	53
		51	Startup	Minimize, not to exceed 30 minutes		
	40 CFR 63.6640(f)	52	Hours of operation	Non-emergency hours limited		

**Emission Unit Boilers (B-1, B-2)**

12. Applicable Requirement: Visible emissions from the Boilers (B-1, B-2) may not equal or exceed an average of 20% opacity with the exception that visible emissions may equal or exceed an average of 20% opacity for up to two independent six minute blocks in any hour, as long as the average opacity during each of these two six minute blocks is less than 40%. [0AR 340-208-0110(6)]
13. Applicable Requirement: The permittee must not emit particulate matter emissions from the boilers (B-1, B-2) in excess of 0.10 grains per dry standard cubic foot, corrected to 12% CO<sub>2</sub>. [0AR 340-228-0210(2)(b)(A)]

14. ~~Applicable Requirement:~~ The permittee must comply with the following emission limits and work practices on the boilers. The emission limits apply at all times during operation except for boiler startup and shutdown. [40 CFR 63.7500(a)(1)]
- 14.a. The permittee must comply with either a limit on filterable particulate matter emissions or emissions of Total Selected Metals (TSM).
    - 14.a.i. The filterable particulate matter emission limit is 0.037 lb/MMBtu heat input or 0.043 lb/MMBtu steam output.
    - 14.a.ii. The TSM limit is 2.4E-04 lb/MMBtu heat input or 2.8E-04 lb/MMBtu steam output. TSM is the sum of arsenic, beryllium, cadmium, chromium, lead, manganese, nickel and selenium emissions.
  - 14.b. Emissions of carbon monoxide (CO) must not exceed 1,500 ppmv, dry basis at 3% O<sub>2</sub> or 1.4 lb/MMBtu steam output.
  - 14.c. Emissions of mercury must not exceed 5.7E-06 lb/MMBtu heat input or 6.4E-06 lb/MMBtu steam output.
  - 14.d. Emissions of hydrogen chloride (HCl) must not exceed 0.022 lb/MMBtu heat input or 0.025 lb/MMBtu steam output.
  - 14.e. If demonstrating compliance with a lb/MMBtu steam output limit, the permittee may use efficiency credits earned from implementation of energy conservation measures taken after January 1, 2008 in accordance with 40 CFR 63.7533 to comply with the standards.
  - 14.f. The permittee must conduct a tune-up of the boilers every five years as specified in 40 CFR 63.7540(a)(10). The initial tune-up has been conducted. Each subsequent tune-up must be conducted no more than 61 months after the previous tune-up. [40 CFR 63.7515(d)]
  - 14.g. The permittee must see that a one-time energy assessment is performed by a qualified energy assessor. The energy assessment will be eight on-site technical labor hours in length maximum, but may be longer at the discretion of the permittee. The boilers and any processes accounting for at least 50% of the steam use must be evaluated to identify energy saving opportunities within the limit of the 8-hour assessment. [40 CFR 63.7575] The assessment must include the following:
    - 14.g.i. A visual inspection of the boiler.
    - 14.g.ii. An evaluation of the operating characteristics of the boilers, specifications of the steam using systems, operating and maintenance procedures, and unusual operating constraints.
    - 14.g.iii. An inventory of major steam use systems consuming energy from the boilers.
    - 14.g.iv. A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage.
    - 14.g.v. A review of the energy management practices and recommendations for improvements consistent with the definition of energy management practices, if identified.
    - 14.g.vi. A list of cost-effective energy conservation measures that are within the facility's control.
    - 14.g.vii. A list of the energy savings potential of the energy conservation measures identified.
    - 14.g.viii. A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.
15. ~~Applicable Requirement:~~ The permittee must maintain boiler opacity less than or equal to 10% opacity on a daily block average. [40 CFR 63.7500(a)(2)] The daily block average is the arithmetic mean of all valid opacity readings recorded when a boiler is operating over the 24-hour period from 12 a.m. (midnight) to 12 a.m. (midnight), except for periods of startup and shutdown or downtime. [40 CFR 63.7575]
16. ~~Monitoring Requirement:~~ The permittee must monitor the operational load of the boilers and maintain the operating load of each boiler such that it does not exceed 110% of the highest hourly average operating load recorded during the most recent performance test according to the procedures of Table 7 of 40 CFR 63, Subpart DDDDD. [40 CFR 63.7500(a)(2)]

17. ~~Applicable Requirement:~~ During startup the permittee must use one or a combination of the following clean fuels: natural gas, synthetic natural gas, propane, distillate oil, syngas, ultra-low sulfur diesel, fuel oil, soaked rags, kerosene, hydrogen, paper, cardboard, refinery gas, or liquefied petroleum gas. All continuous monitoring systems must be operating during startup and shutdown. Anytime hogged fuel is burned the exhaust must be vented through control devices to the common stack. The permittee must be in compliance with this permit condition no later than January 31, 2017. [40 CFR 63.7500(f)]
18. ~~Boiler Testing Requirements:~~ The permittee must conduct compliance testing, emission factor verification and/or performance tests in accordance with Condition 58, the Department's Source Sampling Manual, and 40 CFR 63.7520 for the boilers using the following test methods and frequencies. As an alternative, compliance with the HCl, mercury, and total selected metals limits may be demonstrated by fuel analysis in accordance with Condition 19. [40 CFR 63.7505(e)]

**Table 4 – Boiler Testing**

Pollutant/Parameter	Test Method	Frequency	Purpose
Particulate	DEQ Method 5	Once during permit term	Performance verification
	EPA Method 5 or 17	Annually	Compliance testing
Opacity	COMS and/or Method 9	Continuous for COMS, M9 during PM test	Performance verification
NO <sub>x</sub>	EPA Method 7E	Once during permit term between February 1 and June 30	EF verification
CO	EPA Method 10	Annually	Compliance testing
		Once during permit term between February 1 and June 30	EF verification
Total Select Metals (TSM)	EPA Method 29	Annually	Compliance testing
Mercury	EPA Method 29, 30A, 30B, 101A, or ASTM D6784	Annually	Compliance testing
Hydrogen Chloride (HCl)	EPA Method 26 or 26A	Annually	Compliance Testing

- 18.a. Annual performance tests must be completed no more than 13 months after the preceding test. [40 CFR 63.7515(a)]
- 18.b. Three tests must be performed for each pollutant, each a minimum of 60 minutes long for each pollutant required to be tested.
- 18.c. During the performance verification testing, the combined steaming rate of B-1 and B-2 must be at least 90% of normal maximum operating capacity, as determined from the prior 6 months operating data.
- 18.d. During each test run, the permittee must record the following information:
- 18.d.i. Test location;
  - 18.d.ii. Boiler hog fuel sampling and analysis, including but not limited to fuel characteristics, including moisture, percentage less than 1/8" in size, species, and percentage of wood and bark;
  - 18.d.iii. Boilers 1 and 2 operating conditions, including but not limited to:
    - 18.d.iii.A. Individual boiler and combined boiler steaming rates, (lb/hr);
    - 18.d.iii.B. Boiler steam pressure (psig);
    - 18.d.iii.C. Residual oxygen (%).
  - 18.d.iv. B-1 and B-2 multiclone pressure drop (inches of water), hourly averages;
  - 18.d.v. Dry electrostatic precipitator operating conditions, including but not limited to:
    - 18.d.v.A. Number of TR sets operating;
    - 18.d.v.B. Voltage of each TR set (kV);
    - 18.d.v.C. Current of each TR set (mA).

- 18.d.vi. Emission results must be reported as follows:
- 18.d.vi.A. Total particulate for each test run (gr/dscf, gr/dscf @12% CO<sub>2</sub>, lbs/hr, lbs/1000 lbs steam, lbs/MMBtu heat input or lbs/MMBtu steam output);
  - 18.d.vi.B. If measuring total selected metals report as lbs/MMBtu heat input or lbs/MMBtu steam output)
  - 18.d.vi.C. Opacity for each run (%) — either from COMS or Method 9 reading conducted either during each test run or no greater than 30 minutes before or after each test run.
  - 18.d.vi.D. Outlet NO<sub>x</sub> emissions from each test run (ppmv, lbs/hr, lbs/1000 lb steam);
  - 18.d.vi.E. Outlet CO emissions from each test run (ppmv, dry @ 3% O<sub>2</sub>, lbs/hr, lbs/1000 lb steam, lbs/MMBtu steam output);
  - 18.d.vi.F. Outlet mercury emissions from each test run (lbs/MMBtu heat input or lbs/MMBtu steam output).
  - 18.d.vi.G. Outlet HCl emissions from each test run (lbs/MMBtu heat input or lbs/MMBtu steam output).
- 18.e. If performance tests for a given pollutant are at or below 75% of the emission limits in Conditions 14.a through 14.d for two consecutive years and if there are no changes to the boiler or control equipment that could increase emissions, the permittee may conduct performance tests for that pollutant every third year. Each such performance test must be conducted no more than 37 months after the previous performance test. If a performance test shows emissions exceeded the limit or 75% of the emission limit for a pollutant, the permittee must conduct annual performance tests for that pollutant until all performance tests over a consecutive 2-year period are at or below 75% of the emission level. [40 CFR 63.7515(b), (e)]
19. Fuel Analysis: If electing to demonstrate compliance with the standards for mercury, HCl, or TSM by fuel analysis, the permittee must conduct a monthly fuel analysis for each type of fuel burned according to 40 CFR 63.7521. [40 CFR 63.7515(e)] The monthly analysis can be completed any time within the calendar month as long as the analysis is separated by 14 calendar days from the previous analysis. The permittee must obtain at least 3 composite fuel samples according to 40 CFR 63.7521(e), prepare each composite sample according to 40 CFR 63.7521(d) and analyze the sample according to 40 CFR 63.7521(e). Data from the fuel analyses must be used to calculate emissions of mercury, HCl or TSM with a 90% confidence level according to 40 CFR 63.7530(e). The calculated emissions must be compared to and be less than the corresponding emission limit to determine compliance on a 12-month rolling average. [40 CFR 63.7540(a)] If 12 consecutive monthly fuel analyses demonstrate 75% or less of the compliance level, the frequency of fuel analysis can be decreased to quarterly. If any quarterly sample exceeds 75% of the compliance level or a new type of fuel is burned, the frequency reverts to monthly monitoring until 12 months of fuel analyses are again less than 75% of the compliance level. [40 CFR 63.7515(e)]
20. Monitoring Requirement: The permittee must maintain, calibrate, operate and record the output of a continuous opacity monitoring system (COMS) on the exhaust stack of the DESP 1 control device on the boilers (B-1, B-2) in accordance with the Department's Continuous Monitoring Manual and 40 CFR 60, Appendix B, Performance Specification 1. [OAR 340-212-0120, 340-212-0210, 340-212-0250, and 40 CFR 63.7525(e)(1)]
- 20.a. Conduct a performance evaluation according to 40 CFR 63.8(e) and Performance Specification 1. [40 CFR 63.7525(e)(2)]
  - 20.b. The span value for the COMS must be between 30 and 40 percent.
  - 20.c. The zero and upscale calibration for the COMS must be monitored at least once daily utilizing a procedure that must include a method for producing a simulated zero opacity condition and an upscale span opacity condition using a certified neutral density filter or other related techniques to produce a known obscuration of the light beam. The procedure must provide a system check for the analyzer internal optical surfaces and all electronic circuitry including the lamp and photo

- detector assembly. A quarterly performance audit and an annual zero alignment audit must also be performed. [40 CFR 63.7525(e)(5)]
- 20.d. Except for COMS system breakdowns, repairs, calibration checks, and zero and span adjustments, sampling and analyzing for each successive 10-second period and on cycle of data recording for each successive 6-minute period. [40 CFR 63.7525(e)(3)]
- 20.e. The COMS must be capable of: [40 CFR 63.7525(e)(4)]
- 20.e.i. Reducing all the data to 6-minute averages, calculated from 36 or more data points equally spaced over each 6-minute period. A 6-minute period is any one of the 10 equal parts of a 1-hour period;
  - 20.e.ii. Recording the 6-minute average and daily block average opacity collected for periods during which the COMS is not out of control; [40 CFR 63.7525(e)(7)]
  - 20.e.iii. Recording the total time that opacity was greater than or equal to 20% in each clock hours; and
  - 20.e.iv. Recording the average excess emissions (% opacity) for any 6-minute block that the opacity is greater than 20%.
- 20.f. Data recorded by the COMS may be rounded to the nearest 1% opacity.
- 20.g. Operate and maintain the COMS according to the requirements of the monitoring plan and 40 CFR 63.8(e). Identify periods when the COMS is out of control including any periods when the COMS fails to pass a daily calibration drift assessment, a quarterly performance audit, or an annual zero alignment audit. Any 6-minute period for which the monitoring system is out of control and data are not available for a required calculation constitutes a deviation from the monitoring requirements. [40 CFR 63.7525(e)(6)]
- 20.h. The compliance assurance monitoring (CAM) emission action level for the 20% short-term opacity limit is 15% opacity as a 6-minute average. If an emission action level excursion occurs, the permittee must take corrective action and record the following information:
- 20.h.i. Date and time of the excursion;
  - 20.h.ii. Cause of the excursion;
  - 20.h.iii. Date and time corrective action initiated; and
  - 20.h.iv. A brief description of the corrective action.
- 20.i. If corrective action cannot be initiated within 2 hours or the corrective action does not reduce emissions below the action level opacity within 2 hours, the permittee must notify the Department of the excursion within 24 hours. Otherwise the permittee must report the number of emission action level excursions in the semi-annual monitoring report required by Condition 77.
21. Monitoring Requirements: For each boiler (B-1 and B-2) the permittee must calibrate, maintain, operate and record the output of a continuous monitoring system for measuring the oxygen trim in accordance with the manufacturer's written instructions. The oxygen level must be set no lower than the lowest hourly average oxygen concentration measured during the most recent CO performance test according to Table 7 of 40 CFR 63, Subpart DDDDD. [40 CFR 63.7525(a)(7)]
22. Monitoring Requirement: The permittee must monitor and display the voltage and current of the three transformer rectifier sets (TR sets) of the dry electrostatic precipitator (DESP-1) serving the boilers (B-1, B-2). Monitoring must be in accordance with the manufacturer's written instructions and the permittee must record the output from the TR sets at least once at the end of each clock hour. The permittee must take corrective action any time the operating ranges of two of the three TR sets, as established by actual operating ranges and the manufacturer's recommendations are outside the following ranges: [OAR 340-212-0210]
- 22.a. Voltage, as measured in any two of the three operating TR sets, must be between 20 and 50 kV.
  - 22.b. Current in any two of the three operating TR sets must be 75 to 500 mA.
  - 22.c. If any TR set is not in operation, readings of those parameters must be recorded as zero; this will not be considered cause for corrective action due to operating range exceedance.
  - 22.d. The permittee must maintain records of the number and duration of excursions identified in this condition, and corrective actions taken.



- 22.e. ~~Any excursion of any of these operating ranges is not necessarily a violation of either the opacity or the grain loading standards.~~
23. ~~Operation and Maintenance Requirements, Boilers and Dry ESP (B-1, B-2, and DESP-1): For B-1, B-2 and DESP-1 the permittee must continue to implement the Boiler Operation, Monitoring & Maintenance Manual (BOM<sup>3</sup>). The BOM<sup>3</sup> specifies the minimum required inspection, monitoring, maintenance, trouble-shooting, training, and calibration as well as procedures for managing excursions and upsets, including allowable operating modes and ranges, to ensure B-1 and B-2 are operated at their highest reasonable efficiency and effectiveness to minimize emissions of air contaminants. The BOM<sup>3</sup> must be reviewed at least annually and updated as needed. [OAR 340-226-0120(1)(a)] The following minimum requirements must be incorporated into the BOM<sup>3</sup>:~~
- 23.a. ~~At least once each calendar year the permittee must visually inspect those aspects of the multielones that may affect their performance, including but not limited to the individual cyclone dimensions. If a multielone is found to be in need of repair, as determined by vendor specifications, it must be repaired or replaced to ensure efficient operation. The results of the inspection and any repairs or replacements must be recorded in a log. [OAR 340-218-0050]~~
- 23.b. ~~At least once each calendar year the permittee must inspect all aspects of the DESP that may affect the performance of the control device, including but not limited to the discharge electrodes (wires), collection electrodes (plates), transformer-rectifier (TR) sets, voltage and frequency, collection electrode vibrators, shell integrity, ash conveying system, and alarms. All aspects of the DESP not in acceptable condition, as determined by the specifications provided by the vendor, must be repaired or replaced as soon as practicable to ensure efficient operation. The results of the inspection and any repair or replacement activities must be recorded in a log. [OAR 340-218-0050]~~
- 23.e. ~~At least once each calendar year the permittee must inspect all aspects of the boilers that may affect good combustion or other performance indicators, in accordance with the manufacturer's recommendations. Also included here must be calibration of all devices or processes which may affect good combustion control. The results of the inspection and any repair or replacement activities must be recorded in a log. [OAR 340-218-0050]~~
- 23.d. ~~At least twice per calendar year and whenever replacement of any of the monitoring devices occurs, e.g., oxygen sensors, pressure sensors, thermocouples, etc., calibrate or check said devices in accordance with the vendor's specifications. The results of the inspection and any replacement activities must be recorded in a log. [OAR 340-218-0050]~~
24. ~~Recordkeeping Requirements: The permittee must maintain the following process records: [OAR 340-218-0050(3)(b)]~~
- 24.a. ~~Hourly and annual records of the total combined steam produced in the hog fuel boilers (B-1 and B-2), as well as individual boiler steam production; [40 CFR 63.7555(e)]~~
- 24.b. ~~Boiler (B-1, B-2) residual oxygen (hourly average);~~
- 24.e. ~~Boiler (B-1, B-2) corrective action log;~~
- 24.d. ~~Type and amount of fuels used in the boilers; [40 CFR 63.7540(a)(2), 7550(d)(1), 7555(d)(1)] This includes fuel used during each startup and shutdown. [40 CFR 63.7550(j)]~~
- 24.e. ~~Sulfur content of the distillate fuel oil;~~
- 24.f. ~~Dry electrostatic precipitator (DESP-1) operating records or parameters required in Condition 22;~~
- 24.g. ~~Dry electrostatic precipitator (DESP-1) corrective action log; and~~
- 24.h. ~~All monitoring data for opacity including during performance evaluations as required in 40 CFR 63.6(h)(7)(i) and (ii). [40 CFR 63.7555(b)(2) and (c)]~~
- 24.i. ~~If demonstrating compliance using fuel analysis, maintain a copy of all calculations and supporting documentation of HCl, mercury, or TSM emission rates. [40 CFR 63.7555(d)(4), (5), and (9)]~~
- 24.j. ~~Maintain on-site a report of the tune-up information required in 40 CFR 63.7540(a)(10)(vi).~~

- 24.k. ~~If electing to stack test less frequently than annually, maintain records that document that emissions from previous stack tests were less than 75% of the applicable emission limit, and that there was no change in source operations including fuel composition and operation of air pollution control equipment that would cause emissions of the relevant pollutant to increase within the past year. [40 CFR 63.7555(d)(6)]~~

### **Emission Unit Veneer Drying (VD)**

25. Applicable Requirement: ~~The permittee must not cause or allow the operation of the veneer dryers (VD) such that visible air contaminants emitted from the dryer abort stacks or RCO-1 exceed:~~
- 25.a. ~~A daily average operating opacity of 10% on more than two days within any 12-month period, with the days separated from each other by at least 30 days. [OAR 340-234-0510(1)(b)(A)]~~
- 25.b. ~~A maximum opacity of 20% at any time. [OAR 340-234-0510(1)(b)(B)]~~
26. Applicable Requirement:
- 26.a. The permittee must not cause or allow the emissions of particulate matter from VD in excess of 0.10 grain per dry standard cubic foot. [OAR 340-226-0210(2)(b)(A)]
- 26.b. The dryer must be maintained and operated at all times such that the air contaminant generating processes and all air contaminant control equipment (RCO-1) must be at full efficiency and effectiveness so that the emission of air contaminants are kept at the lowest practicable levels. [OAR 340-234-0510(1)(c)]
- 26.c. ~~The permittee must not willfully cause or permit the installation or use of any means, such as dilution, which, without resulting in a reduction in the total amount of air contaminants emitted, conceals and emission which would otherwise violate Conditions 25 or 26.a. [OAR 340-234-0510(1)(f)]~~
27. Monitoring Requirement: ~~The permittee must continue to maintain and implement the Veneer Dryer Operation, Monitoring and Maintenance Manual (VDOM<sup>3</sup>). The VDOM<sup>3</sup> must include the inspection, maintenance and calibration procedures required to ensure effective capture of veneer dryer emissions and routing to the control device (RCO-1), to the extent practicable. The VDOM<sup>3</sup> must include corrective actions and reporting requirements associated with veneer dryer air upsets. The VDOM<sup>3</sup> must be reviewed at least annually and updated as needed.~~
- 27.a. ~~The permittee must include in the VDOM<sup>3</sup> the following minimum monitoring requirements:~~
- 27.a.i. ~~The permittee must calibrate, maintain, operate, and record the output of a continuous monitoring system for determining the position of the abort gates/dampers—open versus closed—which are located on the exhaust gas ducts from veneer dryers 1, 2, and 3.~~
- 27.a.ii. ~~When an abort gate/damper is opened on a veneer dryer, and there is veneer in the dryer, the alarm system must activate immediately.~~
- 27.a.iii. ~~If veneer dryer exhaust gases are discharged directly to the atmosphere through an open or aborted gate/damper while veneer is being dried, rather than being ducted through RCO-1, this is defined as an upset and an abnormal SSM event. For this type of an air upset, the permittee must take corrective action as expeditiously as possible. All corrective actions and SSM required actions must be documented in an air upset log and SSM Deviation Report by date, time, action taken, duration of the upset and person taking the action.~~
- 27.b. ~~The VDOM<sup>3</sup> must address fugitive exhaust gases from the veneer dryer by doing the following:~~
- 27.b.i. ~~The permittee must implement practices to minimize leakage of visible emissions of exhaust gases from the veneer dryers to the extent practicable.~~
- 27.b.ii. ~~The permittee must inspect dryers at least weekly to ensure exhaust gases from the veneer dryers are being captured to the extent practicable.~~

- 27.b.iii. ~~If visible emissions from the veneer dryer are observed during the weekly inspection, actions must be taken to minimize the sources of those emissions within 14 days.~~
28. Recordkeeping Requirements: The permittee must continue to implement a recordkeeping of supporting information program as part of the VDOM<sup>3</sup>. Supporting information includes all calibration and maintenance records and all original strip chart recordings for the parameter monitoring system, and copies of all reports required by the permit. At a minimum the following records must be kept: [OAR 340-218-0050(3)(b)]
- 28.a. ~~Records documenting the date and time of all inspections, including appropriate inspection points and allowable conditions.~~
  - 28.b. ~~Records showing maintenance and calibration of temperature sensors. Records should include methods used, dates of calibration, and person completing the required calibration.~~
  - 28.c. ~~Records showing dates when door seals, moisture sensors, steam control valves and electronic actuator were replaced.~~
  - 28.d. ~~Corrective action logs, as applicable.~~
  - 28.e. ~~Air upset or excess emission logs, as applicable.~~
  - 28.f. ~~RCO-1 combustion chamber temperature, (°F, hourly average).~~
  - 28.g. ~~Pressure drop measured at the inlet damper, (hourly average).~~
  - 28.h. ~~Records showing daily and year-to-date veneer dried, by species (Mft<sup>2</sup>, 3/8" basis).~~
29. Monitoring Requirements: The permittee must continue to maintain and implement the RCO-1 Operation, Monitoring, & Maintenance Manual (RCOM<sup>3</sup>). The RCOM<sup>3</sup> must include the inspection, monitoring, maintenance, and instrument calibration required for the RCO. The RCOM<sup>3</sup> must be reviewed at least annually and updated as needed. The RCOM<sup>3</sup> must include the following elements:
- 29.a. ~~The permittee must include provisions to calibrate, maintain, operate and record the output of a continuous parameter monitoring system (CPMS) for measuring the RCO-1 combustion chamber temperature and pressure drop at the inlet damper to the unit in accordance with the manufacturer's written recommendations and instructions. Real time data must be displayed each minute and a three (3) hour block average temperature and pressure drop must be recorded whenever the veneer dryers are in operation and wood is being dried. The permittee must also periodically test an alarm system to ensure that the operators are made aware of the fact that RCO-1 is being operated outside an acceptable range. A deviation is defined as:~~
    - 29.a.i. ~~A combustion chamber temperature less than the limit in Condition 31.~~
    - 29.a.ii. ~~A pressure drop measured at the inlet damper which is outside the range of 2.0 to 6.0 inches of water for any three hour block average.~~
  - 29.b. ~~Minimum data availability must be as required by applicable portions of DEQ's Continuous Monitoring Manual. Monitor data availability must be determined excluding periods of calibration, startup, shutdown and routine maintenance. All excursions and the corrective actions taken must be recorded. An exceedance of the pressure drop action level is not necessarily a violation of the particulate emission standard.~~
30. Applicable Requirement: The permittee must operate the regenerative catalytic oxidizer (RCO-1) on the veneer dryers such that emissions of total hazardous air pollutants (HAP), measured as total hydrocarbons (THC), as carbon, is reduced by 90%. [40 CFR 63.2240(b)] The permittee must comply with this standard at all times except during periods of veneer dryer or RCO startup, shutdown, and malfunction. [40 CFR 63.2250(a)]
31. Applicable Requirement: The permittee must maintain the 3-hour block average catalytic oxidizer temperature above the minimum temperature established during the performance test (780°F) and check the activity level of a representative sample of the catalyst at least every 12 months. [40 CFR 63.2240(e)(3)] The permittee must comply with this standard at all times except during periods of veneer dryer or RCO startup, shutdown and malfunction. [40 CFR 63.2250(a)]

32. Applicable Requirement: The permittee must minimize fugitive emissions from the veneer dryer doors (through proper maintenance procedures) and from the green end of the dryers (through proper balancing of the heated zone exhausts) as required in the VDOM<sup>3</sup>. [40 CFR 63.2241(a)] The permittee must comply with this standard at all times except during periods of veneer dryer or RCO startup, shutdown and malfunction prior to veneer dryer initial startup; and during the routine control device maintenance exemption specified in 40 CFR 63.2551. Startup and shutdown periods must not exceed the minimum amount of time necessary for these events. [40 CFR 63.2250(a)]
33. Monitoring Requirement: The permittee must monitor the temperature in the regenerative catalytic oxidizer (RCO-1) in accordance with 40 CFR 63.2269. The temperature monitor must be in operation at all times that the RCO is in operation, except for periods of monitor malfunction, associated repairs, and required quality assurance or control activities. For purposes of calculating data averages, the permittee must not use data recorded during monitor malfunctions, associated repairs, out-of-control periods, 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. 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.
- 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. At least 75 percent of the required recorded readings for the 3-hour period must be based on valid data (not from periods of malfunction, etc.). [40 CFR 63.2270]
34. Monitoring Requirement: The permittee must determine the activity level of a representative sample of RCO catalyst at least every 12 months. [40 CFR 63.2240(b)] The permittee must take any necessary corrective action to ensure that the catalyst is performing within its design range. [40 CFR 63.2271]
35. Monitoring Requirement: The permittee must develop and implement a written startup, shutdown and malfunction plan for the veneer dryers and regenerative catalytic oxidizer (RCO-1). [40 CFR 63.6(e)(3); 63.2250(e)]
36. Testing Requirement: Initial compliance demonstration testing has been completed. If future compliance demonstration testing is required the test must be done in accordance with 40 CFR 63.2262 and the Department's Source Sampling Manual.
37. Recordkeeping and Reporting Requirement: The permittee must report each instance in which it did not meet the requirements of Conditions 30, 31 or 32. This includes periods of startup, shutdown and malfunction, and periods of RCO maintenance. These instances are deviations and must be reported. [40 CFR 63.2271] Deviations that occur during startup, shutdown or malfunction are not violations if the permittee can demonstrate to the Department's satisfaction that it was operating in accordance with 40 CFR 63.6(e).

#### **Emission Unit Press Vents (P-O, P-N)**

38. Applicable Requirements: The permittee must not cause or allow:
- 38.a. Emissions of any air contaminant into the atmosphere from press vents P-N which is equal to or greater than 20% opacity. [OAR 340-208-0110(4)]

- 38.b. Emissions of any air contaminant into the atmosphere from press vents P-O which is equal to or greater than 40% average opacity as a 6-minute block through December 31, 2019. On and after January 1, 2020 the average opacity is limited to 20%. [OAR 340-208-0110(3)(a)]
- 38.e. Emissions of particulate matter from the press vents P-O and P-N in excess of 0.10 grains per dry standard cubic foot. [OAR 340-226-0210(2)(a)(A), (2)(b)(A)]
39. Monitoring Requirement: The permittee must monitor visible emissions from the press vents in accordance with the following procedures, test methods and frequencies:
- 39.a. EPA Method 9 must be used to determine opacity in accordance with the Department's Source Sampling Manual. Each Method 9 test must be a minimum of 6 minutes long unless any one reading is greater than the emission limit for the emission unit, then the observation period must be 60 minutes or until a violation of the applicable limits in Condition 38 has been documented, whichever period is shorter.
- 39.b. Visible emissions testing, using EPA Method 9 may be waived provided both of the following conditions are met:
- 39.b.i. The permittee must conduct a six (6) minute visible emission survey of each emission unit using EPA Method 22.
- 39.b.ii. If visible emissions, excluding condensed water vapor, from an individual monitoring point are detected more than 5% (18 seconds) of the survey time, EPA Method 9 must be conducted on that monitoring point in accordance with Condition 39.a within 24 hours.
- 39.c. EPA Method 9 tests must be conducted at a minimum once each quarter with at least 30 days in between tests.
- 39.d. If, on a regularly scheduled test day, it is not possible to conduct a Method 9 test due to inclement weather conditions or interference from other sources, the permittee must note such conditions on the observation data sheet and must conduct the required emission monitoring as soon as practicable after the regularly scheduled test day, while maintaining the 30-day period between quarterly readings as indicated in Condition 39.e. The permittee must record in a log the reason for not conducting the test on a regularly scheduled test day.
- 39.e. If any test, completed on a regularly scheduled test day, shows a violation of the applicable limits in Condition 38 the permittee must:
- 39.e.i. Take corrective action to remedy the violation within 30 minutes; and
- 39.e.ii. Perform daily tests until at least 5 consecutive days show emissions below the limits. After the 5-day period, the test frequency must be quarterly.
- 39.f. All EPA Method 9 tests and surveys must be performed during periods that the emissions devices are in operation.
40. Recordkeeping Requirement: The permittee must record the daily and annual pressed plywood throughput (actual Mft<sup>2</sup> on a 3/8" basis):

#### **Emission Unit Kilns (K-O)**

41. Applicable Requirement: The permittee must not cause or allow the emissions of any air contaminant into the atmosphere from the kilns (K-O) which:
- 41.a. Has opacity equal to or greater than 40% average opacity as a 6-minute block through December 31, 2019. On and after January 1, 2020 the average opacity is limited to 20%. [OAR 340-208-0110(3)(a)]
- 41.b. Has a particulate concentration in excess of 0.24 grains per dry standard cubic foot prior to December 31, 2019 and in excess of 0.15 grain per dry standard cubic foot on or after January 1, 2020. [OAR 340-226-0210(2)(a)(B)]

42. Monitoring Requirement: The permittee must monitor visible emissions from the kilns (K-O) in accordance with the following procedures, test methods and frequencies: [OAR 340-218-0050(3)(a)]
- 42.a. EPA Method 9 must be used to determine opacity in accordance with the Department's Source Sampling Manual. Each Method 9 test must be a minimum of 6 minutes long unless any one reading is greater than the emission limit for the emission unit, then the observation period must be 60 minutes or until a violation of the applicable limits in Condition 41 has been documented, whichever period is shorter.
  - 42.b. Visible emissions testing, using EPA Method 9 may be waived provided both of the following conditions are met:
    - 42.b.i. The permittee must conduct a six (6) minute visible emission survey of each emission unit using EPA Method 22.
    - 42.b.ii. If visible emissions, excluding condensed water vapor, from an individual monitoring point are detected more than 5% (18 seconds) of the survey time, EPA Method 9 must be conducted on that monitoring point in accordance with Condition 42.a within 24 hours.
  - 42.c. EPA Method 9 tests must be conducted at a minimum once each quarter with at least 30 days in between tests.
  - 42.d. If, on a regularly scheduled test day, it is not possible to conduct a Method 9 test due to inclement weather conditions or interference from other sources, the permittee must note such conditions on the observation data sheet and must conduct the required emission monitoring as soon as practicable after the regularly scheduled test day, while maintaining the 30-day period between quarterly readings as indicated in Condition 42.c. The permittee must record in a log the reason for not conducting the test on a regularly scheduled test day.
  - 42.e. If any test, completed on a regularly scheduled test day, shows a violation of the applicable limit in Condition 41 the permittee must:
    - 42.e.i. Take corrective action to remedy the violation within 30 minutes; and
    - 42.e.ii. Perform daily tests until at least 5 consecutive days show emissions below the limits. After the 5-day period, the test frequency must be quarterly.
  - 42.f. All EPA Method 9 tests and surveys must be performed during periods that the emissions devices are in operation.
43. Recordkeeping Requirement: The permittee must record the daily and annual lumber dried (MBF) in the kilns.

#### **Emission Unit Material Handling (CYC-O, CYC-N)**

44. Applicable Requirement: The permittee must not cause or allow:
- 44.a. Emissions of any air contaminant into the atmosphere from Material Handling (CYC-O) with an opacity equal to or greater than 40% average opacity as a 6-minute block through December 31, 2019. On and after January 1, 2020 the average opacity is limited to 20%. [OAR 340-208-0110(3)(a)]
  - 44.b. A particulate concentration in excess of 0.24 grains per dry standard cubic foot prior to December 31, 2019 and in excess of 0.15 grain per dry standard cubic foot on or after January 1, 2020. [OAR 340-226-0210(2)(a)(B)]
  - 44.c. Emissions of any air contaminant into the atmosphere from Material Handling (CYC-N) with an opacity equal to or greater than 20% average opacity as a 6-minute block. [OAR 340-208-0110(4)]
  - 44.d. Emissions of particulate matter from Material Handling (CYC-N) in excess of 0.14 grains per dry standard cubic foot. [OAR 340-226-0210(2)(b)(B)]
45. Monitoring Requirements: The permittee must monitor visible emissions from the material handling cyclones in accordance with the following procedures, test methods and frequencies:

- 45.a. EPA Method 9 must be used to determine opacity in accordance with the Department's Source Sampling Manual. Each Method 9 test must be a minimum of 6 minutes long unless any one reading is greater than the emission limit for the emission unit, then the observation period must be 60 minutes or until a violation of the applicable limits in Condition 44 has been documented, whichever period is shorter.
- 45.b. EPA Method 9 tests must be conducted at a minimum once each quarter with at least 30 days in between tests.
- 45.c. If, on a regularly scheduled test day, it is not possible to conduct a Method 9 test due to inclement weather conditions or interference from other sources, the permittee must note such conditions on the observation data sheet and must conduct the required emission monitoring as soon as practicable after the regularly scheduled test day, while maintaining the 30-day period between quarterly readings as indicated in Condition 45.b. The permittee must record in a log the reason for not conducting the test on a regularly scheduled test day.
- 45.d. If any test, completed on a regularly scheduled test day, shows a violation of the applicable limits in Condition 44 the permittee must:
- 45.d.i. Take corrective action to remedy the violation within 30 minutes; and
  - 45.d.ii. Perform daily tests until at least 5 consecutive days show emissions below the limits. After the 5-day period, the test frequency must be quarterly.
  - 45.d.iii. All EPA Method 9 tests and surveys must be performed during periods that the emission devices are in operation.
- 45.e. The permittee must complete the minimum monitoring, as applicable, of each baghouse as follows:
- 45.e.i. At least monthly the permittee must inspect each baghouse, record the pressure drop through the baghouse and complete a visual survey of the device to determine if fugitive emissions from each unit are being adequately controlled.
  - 45.e.ii. At least quarterly the permittee must inspect each baghouse and determine if the following devices are working properly: sweep chains, fans and dampers, including proper fan motor balancing, abort gate/damper actuators and seals, spark detection systems, and any alarms associated with proper function of the unit.
  - 45.e.iii. If deficiencies are noted during any inspection, the permittee must take action as expeditiously as possible to ensure the unit is operated in compliance with this permit.
- 45.f. The permittee must complete the minimum monitoring of each cyclone, as applicable, as follows:
- 45.f.i. At least monthly the permittee must visually inspect each cyclone and associated conveyance or material handling system to determine if it is operating properly, and if fugitive emissions from each unit are being adequately controlled.
  - 45.f.ii. At least quarterly the permittee must visually inspect each cyclone and determine if the following devices are in good working order and functioning properly: internal vortex breaker plate, fan motor, abort gate/dampers or other actuators and seals, and any alarms associated with proper function of the unit.
46. Maintenance Requirements: For all baghouses and cyclones, the permittee must continue to implement the Baghouse and Cyclone Operation, Monitoring and Maintenance Manual (BCOM<sup>3</sup>). Included in the BCOM<sup>3</sup> must be such items as instrument calibration, appropriate operating conditions, troubleshooting, inspection requirements and frequencies, and maintenance requirements specified in Condition 45. The permittee must monitor individual baghouses and cyclones and implement actions required to ensure each unit is operated at its highest reasonable efficiency and effectiveness to minimize emissions of air contaminants. The BCOM<sup>3</sup> must be reviewed at least annually and updated as needed. [OAR 340-226-0120(1)(a)]
47. Recordkeeping Requirement: The permittee must continue to implement the recordkeeping program as a part of the BCOM<sup>3</sup>. The minimum required recordkeeping and documentation to support the BCOM<sup>3</sup> program must include the information listed below. [Construction ACDP 31-0015]

- 47.a. ~~The date, place as defined in the permit, and time of inspections, sampling or measurements, as applicable.~~
- 47.b. ~~Records of all inspections, maintenance activities or corrective actions taken.~~
- 47.e. ~~Monthly and annual records of material throughput (BDT) for Material Handling (CYC-O, CYC-N).~~

#### **Emission Units Veneer and Plywood Manufacturing Operations**

- 48. ~~Applicable Requirement: The permittee must not cause or allow the combined emissions of particulate matter from veneer and plywood mill sources, including but not limited to the press vents (P-O, P-N) and cyclone/baghouses CYC-N (Cyclones 15-17) in excess of a total from all sources within the plant site of 65 lb/hr. [OAR 340-234-0510(2)(a)] Compliance with this limit is assured if the maximum hourly plywood production rate is limited to no more than 606 MSF/hr, 3/8" basis.~~
- 49. ~~Monitoring Requirement: The permittee must keep a record of the average hourly production rates for each day of operation in a daily inspection log for the veneer and plywood manufacturing operations at the facility.~~

#### **Emission Unit Fire Pump Engine (ENG)**

- 50. ~~Applicable Requirement: The permittee must perform the following maintenance on the fire pump engine: [40 CFR 63.6602]~~
  - 50.a. ~~Change the oil and filter every 500 hours of operation or annually, whichever comes first. The permittee has the option to use an oil analysis program described in 40 CFR 63.6625(i) in order to extend the oil change requirement.~~
  - 50.b. ~~Inspect air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary.~~
  - 50.c. ~~Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.~~
- 51. ~~Applicable Requirement: During periods of startup the permittee must minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. [40 CFR 63.6602]~~
- 52. ~~Applicable Requirement: Any operation of the engine other than emergency operation, maintenance and testing for more than 50 hours/year is prohibited. Maintenance checks and readiness testing recommended by the manufacturer, the vendor, or the insurance company is limited to no more than 100 hours/year. [40 CFR 63.6640(f)]~~
- 53. ~~Recordkeeping Requirement: The permittee must keep records of the maintenance conducted on the engine. [40 CFR 63.6655(e)] The permittee must keep records of the hours of engine operation that is recorded by a 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. [40 CFR 63.6655(f)]~~

#### **Insignificant Activities Emission Limits and Standards**

- 54. ~~DEQ acknowledges that insignificant emissions units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant emissions as defined in OAR 340-200-0020 exist at facilities required to obtain an Oregon Title V Operating Permit. IEUs must comply with all applicable requirements. In general, the requirements that could apply to IEUs are incorporated as follows:~~



- 54.a. ~~OAR 340 208 0110 (20% opacity)~~
- 54.b. ~~OAR 340 226 0210 (0.10 gr/dscf for non fugitive, non fuel burning equipment)~~
- 54.e. ~~OAR 340 226 0310 (process weight limit for non fugitive, non fuel burning process equipment)~~
- 54.d. ~~OAR 340 228 0210 (0.10 gr/dscf corrected to 12% CO<sub>2</sub> or 50% excess air for fuel burning equipment)~~
- 54.e. The permittee must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to the following: [OAR 340 244 0240, state only enforceable]
- 54.e.i. Minimize gasoline spills;
- 54.e.ii. Clean up spills as expeditiously as practicable;
- 54.e.iii. Cover all open gasoline containers and all gasoline storage tank fill pipes with a gasketed seal when not in use;
- 54.e.iv. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
- 54.e.v. Portable gasoline containers that meet the requirements of 40 CFR Part 59, Subpart F, are considered acceptable for compliance with Condition 54.e.iii.
- 54.f. In addition to the measures specified in Condition 54.e, the permittee must take the following measures to minimize vapor releases: [OAR 340 244 0240, state only enforceable]
- 54.f.i. Do not top off or overfill vehicle tanks. If a person can confirm that a vehicle tank is not full after the nozzle clicks off (such as by checking the vehicle's fuel tank gauge); the person may continue to dispense fuel using best judgment and caution to prevent a spill;
- 54.f.ii. Post a sign at the gasoline dispensing facility (GDF) instructing a person filling up a motor vehicle to not top off the vehicle tank;
- 54.f.iii. Ensure that cargo tanks unloading at the GDF comply with Conditions 54.e.i through 54.e.iii, 54.f.i and 54.f.ii.
- 54.f.iv. The permittee must only load gasoline into storage tanks at the facility by utilizing submerged filling, as defined in OAR 340 244 0030. The submerged fill pipe must be no more than 12 inches from the bottom of the storage tank.

Unless otherwise specified in this permit or an applicable requirement, DEQ is not requiring any testing, monitoring, recordkeeping or reporting for the applicable emissions limits and standards that apply to IEUs. However, if testing were performed for compliance purposes, the permittee would be required to use the test methods identified in and perform the testing in accordance with DEQ's Source Sampling Manual.

#### PLANT SITE EMISSION LIMITS

55. The permittee must not cause or allow plant site emissions to exceed the following limits for any 12 consecutive calendar month period: [OAR 340 222 0040 through OAR 340 222 0043]

**Table 5 Plant Site Emission Limits**

Pollutant	Plant Site Emission Limit (tons/yr)	Unassigned Emissions (tons/yr)
PM	100	25
PM <sub>10</sub>	62	15
PM <sub>2.5</sub>	45	10
SO <sub>2</sub>	39	38
NO <sub>x</sub>	171	0
CO	267	100
VOC	82	40
GHG (CO <sub>2</sub> e)	165,000	0

[illegible]

- 56.b. The emissions factors listed in Condition 56.a are not enforceable limits unless otherwise specified in this permit. Compliance with PSELs must only be determined by the calculations contained in this condition.

## EMISSION FEES

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

## TESTING REQUIREMENTS

58. ~~Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with DEQ's Source Sampling Manual. [OAR 340-212-0120, 40 CFR 60.8]~~
- 58.a. ~~Unless otherwise specified by a state or federal regulation, the permittee must submit a source test plan to DEQ at least 30 days prior to the date of the test. The test plan must be prepared in accordance with the Source Sampling Manual and address any planned variations or alternatives to prescribed test methods. The permittee should be aware that if significant variations are requested, it may require more than 30 days for DEQ to grant approval and may require EPA approval in addition to approval by DEQ.~~
- 58.b. ~~For testing to show compliance with Condition 14 the permittee must notify DEQ and provide a test plan at least 60 calendar days before the performance test is initially scheduled to begin. [40 CFR 63.7(b), (e), 63.7545(d), (e)]~~
- 58.c. ~~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.~~
- 58.d. ~~Unless otherwise specified by permit condition or DEQ approved source test plan, all compliance source tests must be performed as follows:~~
- 58.d.i. ~~At least 90% of the design capacity for new or modified equipment;~~
- 58.d.ii. ~~At least 90% of the maximum operating rate for existing equipment; or~~
- 58.d.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.~~
- 58.e. ~~Each source test must consist of at least three (3) test runs and the emissions results must be reported as the arithmetic average of all valid test runs. If for reasons beyond the control of the permittee a test run is invalid, DEQ may accept two (2) test runs for demonstrating compliance with the emission limit or standard.~~
- 58.f. ~~Source test reports prepared in accordance with DEQ's Source Sampling Manual must be submitted to DEQ 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.~~
- 58.g. ~~For initial testing to show compliance with Condition 14 the permittee must submit a Notification of Compliance Status, including all performance test results and fuel analyses, before the close of business on the 60th day following the completion of all performance tests or fuel analyses. The Notification of Compliance Status must contain all the information specified in 40 CFR 63.7545(e). The test results and compliance reports must also be submitted in accordance with 40 CFR 63.7550(h).~~

## GENERAL MONITORING AND RECORDKEEPING REQUIREMENTS

### General Monitoring Requirements

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

### General Recordkeeping Requirements

62. The permittee must maintain the following general records of testing and monitoring required by this permit: [OAR 340-218-0050(b)(A)]
  - 62.a. The date, place as defined in the permit, and time of sampling or measurements;
  - 62.b. The date(s) analyses were performed;
  - 62.c. The company or entity that performed the analyses;
  - 62.d. The analytical techniques or methods used;
  - 62.e. The results of such analyses;
  - 62.f. The operating conditions as existing at the time of sampling or measurement; and
  - 62.g. The records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).
63. 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. [340-214-0114, OAR 340-214-0110, and 340-218-0050(3)(b)]
64. The permittee must comply with the recordkeeping requirements on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(b)(C)]
65. Unless otherwise specified, the permittee must retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings (or other original data) for continuous monitoring instrumentation, and copies of all reports required by the permit. All existing records required by the previous Air Contaminant Discharge Permit or Oregon Title V Operating Permit must also be retained for five (5) years from the date of the monitoring sample, measurement, report or application. [OAR 340-218-0050(b)(B)]

### Boiler NESHAP Recordkeeping Requirements

66. The permittee must maintain all documentation supporting initial notifications and notifications of compliance status. [40 CFR 63.10(b)(2)(xiv), 63.7555(a)(1)]

67. The permittee must maintain previous versions of the performance evaluation plan as required in 40 CFR 63.8(d)(3).
68. The permittee must maintain records of the date and time that each boiler deviation started and stopped. [40 CFR 63.7555(b)(5)]
69. The permittee must maintain records of the occurrence and duration of each malfunction of the boilers or associated air pollution control and monitoring equipment. The permittee must include a record of actions taken during periods of malfunction to minimize emissions. [40 CFR 63.7555(d)(7), (8)]
70. The permittee must maintain records of the calendar date, time, occurrence and duration of each boiler startup and shutdown. Maintain records of the types and amounts of fuel used during each boiler startup and shutdown. [40 CFR 63.7555(d)(10), (11)]

## 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 event) notify DEQ of an excess emission event by phone, email 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 permittee notified DEQ 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 DEQ 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 DEQ for prior authorization, as required in OAR 340-214-0310 and 340-214-0320. New or modified procedures must be received by DEQ in writing at least 72 hours prior to the first occurrence of the excess emission event. The permittee must abide by the approved procedures and have a copy available at all times.
  - 71.e. The permittee must notify DEQ 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.
73. The permittee must report deviations from the boiler NESHAP in accordance with 40 CFR 63.7550.
74. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5). [OAR 340-218-0050(3)(c)(D)]
75. Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]

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

**Submit all notices, reports and applications to:**

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

**Submit payments for invoices and other payments to:**

DEQ – Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
503-229-5359

**Submit all reports for EPA requirements to:**

Clean Air Act Compliance Manager  
US EPA Region 10, MS: OCE-101  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

**~~Boiler NESHAP Notification of Compliance Status~~**

76. ~~The permittee must submit the initial Notification of Compliance Status, including all performance test results and fuel analyses (as applicable), before the close of business on the 60th day following the completion of all performance tests and/or other initial compliance demonstrations. The Notification of Compliance Status report must contain the following information. [40 CFR 63.7545(e)]~~
- 76.a. ~~A description of the boilers including identification of which subcategories the boilers are in, the design heat input capacity, a description of the add-on controls used to comply with the NESHAP, a description of the fuel(s) burned, including whether the fuel(s) were a secondary material determined by the permittee or the EPA through a petition process to be a non-waste under 40 CFR 241.3, whether the fuel(s) were a secondary material processed from discarded non-hazardous secondary materials within the meaning of 40 CFR 241.3, and justification for the selection of fuel(s) burned during the compliance demonstration.~~
- 76.b. ~~Summary of the results of all performance tests and fuel analyses, and calculations conducted to demonstrate initial compliance including all established operating limits, including:~~
- 76.b.i. ~~Identification of whether complying with the PM emission limit or the alternative TSM emission limit;~~
- 76.b.ii. ~~Identification of whether complying with the output-based emission limits or the heat input-based (i.e., lb/MMBtu or ppm) emission limits.~~
- 76.c. ~~A summary of the maximum CO emission levels recorded during the performance test to show that you have met any applicable emission standard.~~

- ~~76.d. Identification of whether planning to demonstrate compliance with each applicable emission limit through performance testing, a CEMS, or fuel analysis.~~
- ~~76.e. A signed certification that all applicable emission limits and work practice standards have been met.~~
- ~~76.f. If there were any deviations from any emission limit, work practice standard, or operating limit, the permittee must also submit a description of the deviation, the duration of the deviation, and the corrective action taken.~~
- ~~76.g. The notification of compliance status must also include the following certification(s) of compliance, as applicable, and signed by a responsible official:~~
  - ~~76.g.i. "This facility complies with the required initial tune-up according to the procedures in 40 CFR 63.7540(a)(10)(i) through (vi)."~~
  - ~~76.g.ii. "This facility has had an energy assessment performed according to 40 CFR 63.7530(e)."~~
  - ~~76.g.iii. "No secondary materials that are solid waste were combusted in any affected unit."~~

### Semi-Annual and Annual Reports

- 77. The permittee must submit three (3) copies of reports of any required monitoring at least every 6 months, completed on forms approved by DEQ. Six month periods are January 1 to June 30, and July 1 to December 31. One copy of the report must be submitted to the EPA 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), 40 CFR 63.7550]
  - 77.a. The first semi-annual report is due on **July 30** and must include the semi-annual compliance certification, OAR 340-218-0080.
  - 77.b. The annual report is due on **March 1** and must consist of the following:
    - 77.b.i. The emission fee report; [OAR 340-220-0100]
    - 77.b.ii. A summary of the excess emissions upset log; [OAR 340-214-0340]
    - 77.b.iii. The second semi-annual compliance certification; [OAR 340-218-0080]
    - 77.b.iv. Other annual reporting requirements:
      - 77.b.iv.A. Total annual steam produced in Boilers 1 & 2;
      - 77.b.iv.B. Total annual veneer dried in the dryers on a 3/8" basis;
      - 77.b.iv.C. Total annual plywood pressed (actual MSF on a 3/8" basis);
      - 77.b.iv.D. Maximum hourly plywood production during the reporting year (MSF/hr on a 3/8" basis);
      - 77.b.iv.E. Total annual lumber dried by species in the kilns;
      - 77.b.iv.F. Total annual material throughput for each cyclone;
      - 77.b.iv.G. Total annual logs debarked and sawed (MBRD – log scale);
      - 77.b.iv.H. Total annual emissions for the year and emissions for each 12-month rolling period for each criteria pollutant.
  - 77.c. The permittee must submit a semi-annual compliance report for the boiler NESHAP. The first compliance report must cover the period from January 31, 2016 to December 31, 2016. [40 CFR 63.7550(b)(1)] The first compliance report must be postmarked or submitted no later than January 31, 2016. [40 CFR 63.7550(b)(2)] Each subsequent compliance report must cover the semi-annual reporting period from January 1 through June 30 or July 1 through December 31. [40 CFR 63.7550(b)(3)] The subsequent compliance reports must be postmarked or submitted no later than July 31 or January 31 whichever date is the first date following the end of the reporting period. [40 CFR 63.7550(b)(4)] The compliance report must contain the following information: [40 CFR 63.7550(c)]
    - 77.c.i. Company facility name and address.
    - 77.c.ii. Boiler information, emission limitations, and operating parameter limitations.
    - 77.c.iii. Date of report and beginning and ending dates of the reporting period.
    - 77.c.iv. Total boiler operating times during the reporting period.

- 77.c.v. Manufacturer, model number of the COMS and date of the last certification or audit.
  - 77.c.vi. Total fuel use by each individual boiler during the reporting period including a description of the fuel.
  - 77.c.vii. If conducting performance tests once every 3 years, the date of the last 2 performance tests and a statement as to whether there have been any operational changes since the last performance test that could increase emissions.
  - 77.c.viii. A statement indicating that no new types of fuel are burned in the boilers. If a new type of fuel is burned the permittee must follow the procedures in 40 CFR 63.7550(c)(5)(viii) to determine emissions while burning the new fuel are in compliance with the emission limits. If compliance cannot be demonstrated by fuel analysis, a statement indicating the intent to conduct a new performance test within 60 days of starting to burn the new fuel must be included.
  - 77.c.ix. A summary of monthly fuel analysis if fuel analysis is used to demonstrate compliance.
  - 77.c.x. If there were no deviations from any emission limit or operating limit, a statement that there were no deviations.
  - 77.c.xi. If there were no deviations from the monitoring requirements, including no periods during which the COMS were out of control, a statement that there were no deviations or periods when the COMS were out of control during the reporting period.
  - 77.c.xii. If a malfunction occurred during the reporting period, the report must include the number, duration, and a brief description for each type of malfunction which caused or may have caused any applicable emission limitation to be exceeded. The report must include a description of actions taken to correct the malfunction.
  - 77.c.xiii. Include the date of the most recent tune-up for each boiler. Include the date of the most recent burner inspection.
  - 77.c.xiv. A statement by a responsible official with that official's name, title and signature, certifying the truth, accuracy and completeness of the content of the report.
  - 77.c.xv. For each deviation from a boiler emission limit or operating limit the compliance report must contain a description of the deviation, information on the number, duration, and cause of the deviation, as well as corrective actions taken, and if the deviation occurred during an annual performance test, provide the date the annual performance test was completed. [40 CFR 63.7550(d)]
78. 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)]
- 78.a. The identification of each term or condition of the permit that is the basis of the certification;
  - 78.b. The identification of the method(s) or other means used by the permittee for determining the compliance status with each term and condition during the certification period. 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 incorporated by reference into the permit. When certifying compliance with new applicable requirements that are not yet in the permit, the permittee must provide the information required by this condition.* If necessary, the permittee also must identify any other material information that must be included in the certification to comply with section 113(c)(2) of the FCAA, which prohibits knowingly making a false certification or omitting material information;
  - 78.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 78.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 340-200-0010, occurred; and

78.d. Such other facts as DEQ may require to determine the compliance status of the source.

79. ~~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).~~

80. ~~Notwithstanding any other provision contained in any applicable requirement, the permittee may use monitoring as required under OAR 340-218-0050(3) and incorporated into the permit, in addition to any specified compliance methods, for the purpose of submitting compliance certifications. [OAR 340-218-0080(6)(e)]~~

81. **~~Plywood and Composite Wood Products NESHAP Reporting Requirements:~~**

81.a. ~~The permittee must report each instance in which the permittee did not meet the requirements and work practices in Conditions 30, 31 and 32. This includes periods of startup, shutdown and malfunction and periods of control device maintenance specified in Conditions 81.a.i and 81.a.ii. These instances are deviations from the compliance options, operating requirements and work practice requirements. These deviations must be reported according to the requirements in Condition 81.b. [40 CFR 63.2271(b)]~~

81.a.i. ~~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 time period of startup, shutdown or malfunction are violations, according to the provisions in 40 CFR 63.6(e).~~

81.a.ii. ~~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.~~

81.b. ~~The permittee must submit a compliance report semi-annually along with the semi-annual compliance certification report required by Condition 77. The compliance report must include the following information: [40 CFR 63.2281(a), (b)(5), and (c)].~~

81.b.i. ~~Company name and address.~~

81.b.ii. ~~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.~~

81.b.iii. ~~Date of report and beginning and ending dates of the reporting period.~~

81.b.iv. ~~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).~~

81.b.v. ~~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:~~

81.b.v.A. ~~The date and time when the control device was shut down and restarted.~~

81.b.v.B. ~~Identification of the process units that were operating and the number of hours that each process unit operated while the control device was offline.~~

81.b.v.C. ~~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:

81.b.v.C.1 The total amount of time that each process unit controlled by the control device operated during the semi-annual compliance period and during the previous semi-annual compliance period.

81.b.v.C.2 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 semi-annual compliance period and during the previous semi-annual compliance period.

81.b.v.C.3 Based on the information recorded under Condition 81.b.v.C.1 and 81.b.v.C.2 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:

$$RM = \frac{DT_p + DT_e}{PU_p + PU_e}$$

Where:

RM Annual percentage of process unit uptime during which the 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 semi-annual compliance period;

DT<sub>e</sub> Control device downtime claimed under the routine control device maintenance exemption for the current semi-annual compliance period;

PU<sub>p</sub> Process unit uptime for the previous semi-annual compliance period;

PU<sub>e</sub> Process unit uptime for the current semi-annual compliance period

81.b.vi The results of any performance tests conducted during the semi-annual reporting period:

81.b.vii If there are no deviation 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.

81.b.viii If there were no periods during which the continuous monitoring system (CMS) was out of control as specified in 40 CFR 63.8(e)(7), a statement that there were no periods during which the CMS was out of control during the reporting period.

81.e If the permittee submits a compliance report pursuant to this condition along with, or as part of, the semi-annual monitoring report required by Condition 78, and the compliance report contains 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 semi-annual 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.

81.d For each deviation from a compliance option or operating requirement 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 63.228(e)]

81.d.i The date and time that each malfunction started and stopped.

- 81.d.ii. The date and time that each CMS was inoperative, except for zero (low level) and high level checks.
- 81.d.iii. The date, time and duration that each CMS was out of control, including the information in 40 CFR 63.8(e)(8).
- 81.d.iv. 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 the approved routine control device maintenance exemption; or during another period.
- 81.d.v. 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.
- 81.d.vi. 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.
- 81.d.vii. 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 period.
- 81.d.viii. A brief description of the process units.
- 81.d.ix. A brief description of the CMS.
- 81.d.x. The date of the latest CMS certification or audit.
- 81.d.xi. A description of any changes in CMS, processes or controls since the last reporting period.

#### NON APPLICABLE REQUIREMENTS

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

Rule Citation	Summary	Reason for Not Being Applicable
40 CFR 60, Subpart Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	Boiler installed prior to June 19, 1984
40 CFR 60, Subpart De	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Boiler installed prior to June 9, 1989
40 CFR 60, Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels	Diesel storage tank capacity is less than 75 cubic meters

## 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; April 16, 2015—State Implementation Plan Volume 3, Appendix A4;~~
- b. ~~Continuous Monitoring Manual; April 16, 2015—State Implementation Plan Volume 3, Appendix A6; and~~
- e. ~~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.~~
- e. ~~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 may not install or use any device or other means designed to mask the emission of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [OAR 340 208 0400] This condition is enforceable only by the State.~~

G6. Credible Evidence

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

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

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

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

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

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

The permittee must comply with OAR Chapter 340, Division 248, and 40 CFR Part 61, Subpart M when conducting any renovation or demolition activities at the facility.

G10. Stratospheric Ozone and Climate Protection [40 CFR 82 Subpart F, OAR 340-260-0040]

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

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

- a. Compliance with the conditions of the permit is deemed compliance with any applicable requirements as of the date of permit issuance provided that:
  - i. Such applicable requirements are included and are specifically identified in the permit, or
  - ii. DEQ, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- b. Nothing in this rule or in any federal operating permit alters or affects the following:
  - i. The provisions of ORS 468.115 (enforcement in cases of emergency) and ORS 468.035 (function of department);
  - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - iii. The applicable requirements of the national acid rain program, consistent with section 408(a) of the FCAA; or
  - iv. The ability of DEQ to obtain information from a source pursuant to ORS 468.095 (investigatory authority, entry on premises, status of records).
- e. Sources are not shielded from applicable requirements that are enacted during the permit term, unless such applicable requirements are incorporated into the permit by administrative amendment, as provided in OAR 340-218-0150(1)(h), significant permit modification, or reopening for cause by DEQ.

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

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

- a. Enter upon the permittee's premises where an Oregon Title V Operating Permit program source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under conditions of the permit;
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. As authorized by the FCAA or state rules, sample or monitor, at reasonable times, substances or parameters, for the purposes of assuring compliance with the permit or applicable requirements.

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

The permittee must pay an annual base fee and an annual emission fee for particulates, sulfur dioxide, nitrogen oxides, and volatile organic compounds. The permittee must submit payment to the Department of Environmental Quality, Business Office, 811 SW 6th Avenue, Portland, OR 97204, within 30 days of the date DEQ mails the fee invoice or August 1 of the year following the calendar year for which emission fees are paid, whichever is later. Disputes must be submitted in writing to DEQ. Payment must be made regardless of the dispute. User-based fees will be charged for specific activities (e.g., computer modeling review, ambient monitoring review, etc.) requested by the permittee.

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

- a. The permittee must monitor for, and record, any off-permit change to the source that:
  - i. Is not addressed or prohibited by the permit;
  - ii. Is not a Title I modification;
  - iii. Is not subject to any requirements under Title IV of the FCAA;
  - iv. Meets all applicable requirements;
  - v. does not violate any existing permit term or condition; and
  - vi. May result in emissions of regulated air pollutants subject to an applicable requirement but not otherwise regulated under this permit or may result in insignificant changes as defined in OAR 340-200-0020.
- b. A contemporaneous notification, if required under OAR 340-218-0140(2)(b), must be submitted to DEQ and the EPA.
- c. The permittee must keep a record describing off permit changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those off permit changes.
- d. The permit shield of Condition G9 does not extend to off permit changes.

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

- a. The permittee must monitor for, and record, any section 502(b)(10) change to the source, which is defined as a change that would contravene an express permit term but would not:
  - i. Violate an applicable requirement;
  - ii. Contravene a federally enforceable permit term or condition that is a monitoring, recordkeeping, reporting, or compliance certification requirement; or
  - iii. Be a Title I modification.

- b. ~~A minimum 7-day advance notification must be submitted to DEQ and the EPA in accordance with OAR 340-218-0140(3)(b).~~
- e. ~~The permit shield of Condition G9 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)(e)]**

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

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

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

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

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

**G22. Need to Halt or Reduce Activity Not a Defense [OAR 340-218-0050(6)(b)]**

~~The need to halt or reduce activity will not be a defense. It will not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.~~

**G23. Duty to Provide Information [OAR 340-218-0050(6)(e) and OAR 340-214-0110]**

~~The permittee must furnish to DEQ, within a reasonable time, any information that DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee must also furnish to DEQ copies~~

~~of records required to be retained by the permit or, for information claimed to be confidential, the permittee may furnish such records to DEQ along with a claim of confidentiality.~~

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

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

G25. Severability Clause ~~[OAR 340-218-0050(5)]~~

~~Upon any administrative or judicial challenge, all the emission limits, specific and general conditions, monitoring, recordkeeping, and reporting requirements of this permit, except those being challenged, remain valid and must be complied with.~~

G26. Permit Renewal and Expiration ~~[OAR 340-218-0040(1)(a)(D) and 340-218-0130]~~

- a. ~~This permit expires at the end of its term, unless a timely and complete renewal application is submitted as described below. Permit expiration terminates the permittee's right to operate.~~
- b. ~~Applications for renewal must be submitted at least 12 months before the expiration of this permit, unless DEQ requests an earlier submittal. If more than 12 months is required to process a permit renewal application, DEQ must provide no less than six (6) months for the owner or operator to prepare an application.~~
- e. ~~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 the facility at all times a copy of the Oregon Title V Operating Permit and must provide a copy of the permit to DEQ or an authorized representative upon request.~~

~~ALL INQUIRIES SHOULD BE DIRECTED TO:~~

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