



**LRAPA**  
Lane Regional Air Protection Agency

**LANE REGIONAL AIR PROTECTION AGENCY (LRAPA)**  
**TITLE V OPERATING PERMIT**

1010 Main Street  
Springfield, OR 97477  
Telephone (541) 736-1056

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

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**ISSUED TO:**

**Kingsford Manufacturing Company**  
3315 Marcola Road  
Springfield, Oregon 97478

**INFORMATION RELIED UPON:**

Application Number: 67483, 67535  
Received: September 15, 2021,  
October 11, 2021

**PLANT SITE LOCATION:**

3315 Marcola Road  
Springfield, Oregon 97478

**LAND USE COMPATIBILITY STATEMENT:**

Issued by: City of Springfield  
Dated: July 1, 1999

**ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY**

*Steven A. Dietrich*  
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Steven A. Dietrich, Director

November 15, 2021

Date

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Nature of Business: Charcoal Manufacturing  
Primary SIC: 2861 – Gum and Wood Chemicals  
Primary NAICS: 325194 – Cyclic Crude, Intermediate, and Gum and Wood Chemical Manufacturing

**RESPONSIBLE OFFICIAL:**

Title: Plant Manager  
Phone: (541) 744-4553

**FACILITY CONTACT PERSON:**

Name: Karen Chavez  
Title: Plant Engineer  
Phone: (541) 744-4558

**ADDENDUM NO. 2**  
**(Minor Permit Modification)**

In accordance with OAR 340-218-0170(1)(a), Title V Operating Permit No. 204402 is hereby amended to reflect the replacement of the dip tank and curtain coater on the existing solvent treated briquet (STB) operation with a spray application system.

Condition 52 is modified as follows to reflect the replacement of the dip tank and curtain coater on the existing solvent treated briquet (STB) operation with a spray application system:

52. Applicable Requirement: The permittee must operate EU11 Solvent Treated Briquet Operations according to the following procedures. [LRAPA 32-008(2) and 40 CFR 64.3(b)(4)(iii)]

- 52.a. Solvent must be transferred to the surge tanks in the railcar unloading building only by submerged filling.
- 52.b. All solvent used during briquet treatment operation must be cooled to below 50°F, as a daily average value, before being pumped to the spray application system into the dip tank.
- 52.c. Solvent must be added to the dip tank only by submerged filling.
- 52.d. The permittee must perform prescreening of briquets prior to solvent application in order to minimize the production of solvent coated fines.
- 52.d. During solvent treated briquet operation, the permittee must collect the solvent vapors generated in the briquet treatment area and must exhaust the collected solvent vapors to the ACC serving the charcoal retort furnace. The collection of the solvent vapors must satisfy the following enclosure requirements:
  - 52.d.i. The total area of all natural draft openings must not exceed 5% of the total surface area of the total enclosure's walls, floor, and ceiling.
  - 52.d.ii. The air passing through all natural draft openings must flow into the enclosure continuously.
- 52.e. The temperature within the combustion zone of the ACC must be maintained at 1400°F and must achieve at least 95% destruction of the VOC generated by the solvent treated briquet operation.
- 52.f. In the event that the ACC is not available, solvent vapors collected from the briquet treatment area may be discharged uncontrolled to the atmosphere. Uncontrolled atmospheric discharge of solvent vapors must not exceed eight (8) hours in one (1) calendar day nor 280 hours in one (1) calendar year.
- 52.g. Solvent may be applied to briquets using the dip tank and/or a curtain coater system spray application system.

Condition 54 is modified as follows to reflect the replacement of the dip tank and curtain coater on the existing solvent treated briquet (STB) operation with a spray application system:

54. Monitoring Requirement: In addition to the monitoring required by Condition Error! Reference source not found., the permittee must measure the temperature on the line to the EU11 Solvent Treated Briquet Operations spray application system dip tank once each day while the STB operation is in use. [LRAPA 34-180, OAR 340-218-0050(3)(a) and 40 CFR 64.3(b)(4)(iii)]

54.a. Recordkeeping Requirement: For each month, the permittee must calculate the daily average temperature on the line to the STB spray application system dip tank. [LRAPA 34-180 and OAR 340-218-0050(3)(b)]



Permit Number: 204402  
Expiration Date: August 26, 2024  
Modified Date: September 14, 2020  
Page 1 of 5

## LANE REGIONAL AIR PROTECTION AGENCY (LRAPA) TITLE V OPERATING PERMIT

1010 Main Street  
Springfield, OR 97477  
Telephone (541) 736-1056

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

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### ISSUED TO:

**Kingsford Manufacturing Company**  
3315 Marcola Road  
Springfield, Oregon 97478

### INFORMATION RELIED UPON:

Application Number: 66298  
Received: July 15, 2020

### PLANT SITE LOCATION:

3315 Marcola Road  
Springfield, Oregon 97478

### LAND USE COMPATIBILITY STATEMENT:

Issued by: City of Springfield  
Dated: July 1, 1999

### ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Merlyn L. Hough, Director

September 14, 2020

Date

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### Nature of Business

Charcoal Manufacturing

### SIC

2861

### NAICS

325191

### RESPONSIBLE OFFICIAL

Title: Plant Manager

### FACILITY CONTACT PERSON

Name: Karen Chavez  
Title: Plant Engineer  
Phone: (541) 744-4558

### ADDENDUM NO. 1 (Minor Permit Modification)

In accordance with OAR 340-218-0170(1)(a), Title V Operating Permit No. 204402 is hereby amended to reduce the unassigned emissions associated with PM<sub>10</sub> and NO<sub>x</sub>, add a limitation related to the Regional Haze program, and update the permit to reflect the use of propane as a backup fuel for natural gas.

Condition 3 is modified as follows to remove fuel specific references in emission unit names:

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

EU ID	Emission Unit Description	Pollution Control Device Description	PCD ID
EU01	Wood Fuel Receipt and Storage	Tilt-Dump Controls <ul style="list-style-type: none"> <li>● Partial Enclosure with Negative Air</li> <li>● Baghouse</li> <li>● Water Spray</li> </ul>	NA
EU02	Hogfuel Sizing and Infeed System	NA	NA
EU03	Charring and Drying System:  Wood Fuel Drying System  Charcoal Manufacturing  Briquet Dryers	After Combustion Chamber  After Combustion Chamber  NA	03-01C  03-01C  NA
	<b>ACC Burners for Startup</b>	NA	NA
EU04	Briquet Cooling	NA	NA
EU08	Briquet Handling System:  Briquetting  Briquet Conveying  Briquet Packaging	Wet Scrubber  Small Vokes Dust Collector West Dust Collector East Dust Collector  North Package Bin Vent Dust Collector South Package Bin Vent Dust Collector	08-26C  08-27C 08-29C 08-30C  08-41C 08-42C
EU10	<b>3.345 MMBtu/hr Boiler</b>	NA	NA
EU11	Solvent Treated Briquet (STB) Operation	ACC  West Dust Collector	03-01C  08-29C
EUAIA	Aggregate Insignificant Activities (AIA)	See Emission Detail Sheets	NA

Condition 4 is modified as follows to indicate that certain natural gas-fired equipment may also use propane:

4. The permittee may also operate under the following two (2) alternative operating scenarios: [LRAPA 34-180 and OAR 340-218-0140(1)]

4.a. EU03-1 ACC Shutdown Briquet Dryer Emissions – When the retort furnace and wood dryer systems in EU03 are shut down and no char is being produced, the source may operate an auxiliary natural gas-**or propane-fired** burner to provide heat to the briquet dryers. [LRAPA 34-180 and OAR 340-218-0050(8)]

4.b. EU03-2 ACC Burner Startup, Planned Shutdown, Scheduled Maintenance, or Malfunction Emissions – During retort furnace and wood dryer startups, when no char is being produced, the source may operate natural gas-**or propane-fired** burners in the ACC to maintain minimum ACC combustion temperatures. [LRAPA 34-180 and OAR 218-0050(8)]

4.c. The permittee must contemporaneously record changes from one alternative operating scenario to another. The record must be made available or submitted upon request by the LRAPA. [LRAPA 34-180 and OAR 340-218-0140(1)(c), 340-218-0050(8)(a)]

Condition 26.a. is modified as follows to indicate that certain natural gas-fired equipment may also use propane:

26.a. The permittee must maintain an operating temperature of at least a 1400°F in the ACC on the retort furnace, except during startup, shutdown or maintenance. The ACC operating temperature must be continuously monitored in the outlet of the ACC combustion chamber, and recorded automatically on a strip chart or data acquisition system. Corrective action must be taken within 10 minutes if the ACC operating temperature falls below 1500°F, except during startup, shutdown or maintenance. Corrective actions include, but are not limited to, turning on auxiliary natural gas- **or propane-fired** burners to provide additional heat.

The name of the categorically insignificant emission unit listed prior to Condition 60 is modified from “274 kW Natural Gas-Fired Emergency RICE” to “274 kW Gas-Fired Emergency RICE” so that the emission unit name is not fuel specific.

The table related to Condition 71 is modified as follows with the revisions in **bold**:

Pollutant	Plant Site Emission Limit (TPY)	Unassigned Emissions (TPY)	Emission Reduction Credit (TPY)
PM	164	134	0
PM <sub>10</sub>	103	<b>46</b>	0
PM <sub>2.5</sub>	96	51	0
SO <sub>2</sub>	39	0	0
NO <sub>x</sub>	103	<b>39</b>	0
CO	99	0	0
VOC	96	0	0
GHG (CO <sub>2</sub> e)	214,233	0	0

Condition 71.a. is added as follows to limit emissions of Regional Haze pollutants PM<sub>10</sub>, NO<sub>x</sub> and SO<sub>2</sub> to no more than 304 TPY combined:

71.a. The combined emissions of Regional Haze precursor emissions as determined in the formula below must not exceed the following limit for any 12 consecutive calendar month period: [40 CFR 51.308(d)(3)(v)(C)&(F)]

$$PM_{10} PSEL + PM_{10} UE + NO_x PSEL + NO_x UE + SO_2 PSEL + SO_2 UE - (SO_2 PSEL - SO_2 PTE) \leq 304 TPY$$

Where:

PM<sub>10</sub> PSEL is the PM<sub>10</sub> Plant Site Emission Limit as calculated in Conditions 72 and 73, in tons per year;

PM<sub>10</sub> UE are the PM<sub>10</sub> unassigned emissions as listed in Condition 71, in tons per year;

NO<sub>x</sub> PSEL is the NO<sub>x</sub> Plant Site Emission Limit as calculated in Conditions 72 and 73, in tons per year;

NO<sub>x</sub> UE are the NO<sub>x</sub> unassigned emissions as listed in Condition 71, in tons per year;

SO<sub>2</sub> PSEL is the SO<sub>2</sub> Plant Site Emission Limit as listed in Condition 71, in tons per year;

SO<sub>2</sub> UE are the SO<sub>2</sub> unassigned emissions as listed in Condition 71, in tons per year; and

SO<sub>2</sub> PTE is the facility potential to emit for SO<sub>2</sub> as listed in the most recent final review report, in tons per year.

The table related to Condition 72 is modified as follows with the revisions in **bold**:

Emissions Unit ID	Emission Unit	Pollutant	Process Parameter Monitored	Emission Factor (EF)		EF Verification Testing Condition	Monitoring and Record Keeping Condition
EU01	Wood Receipt and Storage	PM, PM <sub>10</sub> , PM <sub>2.5</sub>	Wood Throughput (dry tons)	PM = 0.10 lb/dry ton PM <sub>10</sub> = 0.05 lb/dry ton PM <sub>2.5</sub> = 0.01 lb/dry ton		Not Required	72
EU02	Hogfuel Sizing & Infeed System	PM, PM <sub>10</sub> , PM <sub>2.5</sub>	Actual Hours of Operation for Screener In, Screener Out, Secondary Screen In, Secondary Screen Out, and Reject Diverter (hr-opr)	Screener In:	PM = 0.096 lb/hr-opr PM <sub>10</sub> = 0.048 lb/hr-opr PM <sub>2.5</sub> = 0.003 lb/hr-opr	Not Required	72
				Screener Out:	PM = 0.0192 lb/hr-opr PM <sub>10</sub> = 0.01 lb/hr-opr PM <sub>2.5</sub> = 0.001 lb/hr-opr		
				Secondary Screen In:	PM = 0.0192 lb/hr-opr PM <sub>10</sub> = 0.01 lb/hr-opr PM <sub>2.5</sub> = 0.001 lb/hr-opr		
				Secondary Screen Out:	PM = 0.0048 lb/hr-opr PM <sub>10</sub> = 0.002 lb/hr-opr PM <sub>2.5</sub> = 0.0002 lb/hr-opr		
				Reject Diverter:	PM = 0.0192 lb/hr-opr PM <sub>10</sub> = 0.01 lb/hr-opr PM <sub>2.5</sub> = 0.001 lb/hr-opr		
EU03	Charring and Drying System	PM, PM <sub>10</sub> , PM <sub>2.5</sub>	Char Production (tons)	PM = 5.12 lb/ton PM <sub>10</sub> = 3.43 lb/ton PM <sub>2.5</sub> = 3.43 lb/ton		76	72
		VOC, NOx, SO <sub>2</sub> , CO	Char Production (tons)	VOC = 0.3 lb/ton NOx = 3.9 lb/ton SO <sub>2</sub> = 0.5 lb/ton CO = 0.85 lb/ton		77	72
EU03-1	Alternative Operating Scenario (briquet drying)	PM, PM <sub>10</sub> , PM <sub>2.5</sub>	Briquet Production (tons)	PM = 0.5 lb/ton PM <sub>10</sub> = 0.3 lb/ton PM <sub>2.5</sub> = 0.21 lb/ton		Not Required	72
		VOC, NOx, SO <sub>2</sub> , CO	<b>Actual Hours of Operation Under AOS Combusting Natural Gas (hr-opr)</b>	VOC = 0.214 lb/hr-opr NOx = 3.9 lb/hr-opr SO <sub>2</sub> = 0.023 lb/hr-opr CO = 3.28 lb/hr-opr		Not Required	72
		VOC, NOx, SO <sub>2</sub> , CO	<b>Actual Hours of Operation Under AOS Combusting Propane (hr-opr)</b>	VOC = 0.35 lb/hr-opr NOx = 5.68 lb/hr-opr SO <sub>2</sub> = 0.66 lb/hr-opr CO = 3.28 lb/hr-opr		Not Required	72
EU03-2	Alternative Operating Scenario (ACC startup burners)	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , VOC, NOx, SO <sub>2</sub> , CO	<b>Actual Hours of Operation Under AOS Combusting Natural Gas (hr-opr)</b>	PM/PM <sub>10</sub> /PM <sub>2.5</sub> = 0.522 lb/hr-opr VOC = 0.377 lb/hr-opr NOx = 6.34 lb/hr-opr SO <sub>2</sub> = 0.041 lb/hr-opr CO = 4.83 lb/hr-opr		Not Required	72
		PM, PM <sub>10</sub> , PM <sub>2.5</sub> , VOC, NOx, SO <sub>2</sub> , CO	<b>Actual Hours of Operation Under AOS Combusting Propane (hr-opr)</b>	PM/PM <sub>10</sub> /PM <sub>2.5</sub> = 0.536 lb/hr-opr VOC = 0.61 lb/hr-opr NOx = 9.95 lb/hr-opr SO <sub>2</sub> = 1.15 lb/hr-opr CO = 5.74 lb/hr-opr		Not Required	72
EU04	Briquet Cooling	PM, PM <sub>10</sub> , PM <sub>2.5</sub>	Briquet Production (tons)	PM = 0.29 lb/ton PM <sub>10</sub> = 0.10 lb/ton PM <sub>2.5</sub> = 0.050 lb/ton		78	72
EU08	Briquet Handling System	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	Actual Hours of Operation (hr-opr)	1.46 lb/hr-opr		78	72
EU10	<b>3.345 MMBtu/hr Boiler</b>	NOx, CO, VOC	Natural Gas Combustion and Actual Hours of Operation (MMSCF and hr-opr)	NOx = 0.328 lb/hr-opr CO = 0.275 lb/hr-opr VOC = 0.0180 lb/hr-opr		Not Required	72

Emissions Unit ID	Emission Unit	Pollutant	Process Parameter Monitored	Emission Factor (EF)	EF Verification Testing Condition	Monitoring and Record Keeping Condition
		NOx, CO, VOC	Propane Combustion and Actual Hours of Operation (MMSCF and hr-opr)	NOx = 0.475 lb/hr-opr CO = 0.274 lb/hr-opr VOC = 0.0293 lb/hr-opr	Not Required	72
EU11	Solvent Treated Briquet (STB) Operations	VOC	Amount of STB Produced (When ACC is Working and Not Working) (ton STB)	<i>Solvent Application:</i> 2.82 lb/ton STB (when ACC <i>not</i> working) 0.14 lb/ton STB (when ACC working) <i>Solvent Handling:</i> 1.31 tons/year ("fixed" storage tank and equipment losses) <i>Fines System:</i> 2.02 lb/ton STB	Not Required	72

JJW/cmw  
09/14/2020

**LANE REGIONAL AIR PROTECTION AGENCY (LRAPA)**  
**TITLE V OPERATING PERMIT**

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Telephone (541) 736-1056

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**ISSUED TO:**

**Kingsford Manufacturing Company**  
3315 Marcola Road  
Springfield, Oregon 97478

**INFORMATION RELIED UPON:**

Application Number: 62995, 63946  
Received: July 17, 2017, April 5, 2018

**PLANT SITE LOCATION:**

3315 Marcola Road  
Springfield, Oregon 97478

**LAND USE COMPATIBILITY STATEMENT:**

Issued by: City of Springfield  
Dated: July 1, 1999

**ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY**

  
\_\_\_\_\_  
Merlyn L. Hough, Director

AUG 26 2019  
Date

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<u>Nature of Business</u>	<u>SIC</u>	<u>NAICS</u>
Charcoal Manufacturing	2861	325191

**RESPONSIBLE OFFICIAL**

Title: Plant Manager

**FACILITY CONTACT PERSON**

Name:	Karen Chavez
Title:	Plant Engineer
Phone:	(541) 744-4558

Pages 2 - 17 redacted -- outside the scope of the SIP

specified in Condition 65.b.i. for a maximum of 100 hours per calendar year. [40 CFR 63.6640(f)(2)]  
65.b.i. Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition LRAPA for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [40 CFR 63.6640(f)(2)(i)]

66. Recordkeeping Requirement: The permittee must keep the following records: [40 CFR 63.6655(a)]
  - 66.a. A copy of each notification and report that the permittee submitted to comply with 40 CFR 63 Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv). [40 CFR 63.6655(f)(1)]
  - 66.b. Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment). [40 CFR 63.6655(f)(2)]
  - 66.c. Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process equipment to its normal or usual manner of operation. [40 CFR 63.6655(f)(5)]
67. Recordkeeping Requirement: The permittee must keep the records required in Table 6 of 40 CFR 63 Subpart ZZZZ to show continuous compliance with each emission or operating limitation that applies to them. [40 CFR 63.6655(d)]
68. Recordkeeping Requirement: The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE according to their own maintenance plan. [40 CFR 63.6655(e)]
69. Recordkeeping Requirement: The permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. [40 CFR 63.6655(f)]
70. Recordkeeping Requirement: In what form and how long must the permittee keep their records?
  - 70.a. The permittee's records must be in a form suitable and readily available for expeditious review according to 40 CFR §63.10(b)(1).
  - 70.b. As specified in 40 CFR §63.10(b)(1), the permittee must keep each record for five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
  - 70.c. The permittee must keep each record readily accessible in hard-copy or electronic form for at least five (5) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR §63.10(b)(1).  
[40 CFR 66.6660]

## PLANT SITE EMISSION LIMITS

71. Applicable Requirement: The plant site emissions must not exceed the following limits for any 12 consecutive calendar month period: [LRAPA 42-0040, 42-0041]

Pollutant	Plant Site Emission Limit (TPY)	Unassigned Emissions (TPY)	Emission Reduction Credit (TPY)
PM	164	134	0
PM <sub>10</sub>	103	77	0
PM <sub>2.5</sub>	96	51	0
SO <sub>2</sub>	39	0	0
NO <sub>x</sub>	103	227	0
CO	99	0	0
VOC	96	0	0
GHG (CO <sub>2</sub> e)	214,233	0	0

#### Plant Site Emission Limits Monitoring

72. Recordkeeping and Monitoring Requirements: [OAR 340-218-0050(3)]

72.a. **By the 15<sup>th</sup> of each month**, the permittee must determine compliance with the Plant Site Emission Limits (PSELs) established in Condition 71 of this permit by conducting the monitoring in the following table. [OAR 340-218-0050(3)(a)]

72.b. Emissions calculations must be performed each month for the preceding 12 consecutive calendar months.

72.c. Compliance with PSELs, except GHGs, must be determined using the calculations contained in Condition 73 using the monitored parameters recorded during the reporting period and the emission factors contained in the following table (PSEL Process Monitoring and Emission Factors), unless the permittee elects to pay emission fees based on actual emissions using a verified emission factor determined in accordance with OAR 340-220-0170. If the permittee is paying on actual emissions based on a verified emission factor, the verified emission factor must be used for determining compliance with the PSEL in accordance with Condition 80.

72.d. The emissions factors listed in the following table (PSEL Process Monitoring and Emission Factors) are not enforceable limits unless otherwise specified in this permit. Compliance with PSELs, except GHGs, must only be determined by the calculations contained in Condition 73.

#### PSEL Process Monitoring and Emission Factors

Emissions Unit ID	Emission Unit	Pollutant	Process Parameter Monitored	Emission Factor (EF)		EF Verification Testing Condition	Monitoring and Record Keeping Condition
EU01	Wood Receipt and Storage	PM, PM <sub>10</sub> , PM <sub>2.5</sub>	Wood Throughput (dry-tons)	PM = 0.10 lb/dry ton PM <sub>10</sub> = 0.05 lb/dry ton PM <sub>2.5</sub> = 0.01 lb/dry ton		Not Required	72
EU02	Hogfuel Sizing & Infeed System	PM, PM <sub>10</sub> , PM <sub>2.5</sub>	Actual Hours of Operation for Screener In, Screener Out, Secondary Screen In, Secondary Screen Out, and Reject Diverter (hr-opr)	Screener In:	PM = 0.096 lb/hr-opr PM <sub>10</sub> = 0.048 lb/hr-opr PM <sub>2.5</sub> = 0.003 lb/hr-opr	Not Required	72
				Screener Out:	PM = 0.0192 lb/hr-opr PM <sub>10</sub> = 0.01 lb/hr-opr PM <sub>2.5</sub> = 0.001 lb/hr-opr		
				Secondary Screen In:	PM = 0.0192 lb/hr-opr PM <sub>10</sub> = 0.01 lb/hr-opr PM <sub>2.5</sub> = 0.001 lb/hr-opr		
				Secondary Screen Out:	PM = 0.0048 lb/hr-opr PM <sub>10</sub> = 0.002 lb/hr-opr PM <sub>2.5</sub> = 0.0002 lb/hr-opr		

Emissions Unit ID	Emission Unit	Pollutant	Process Parameter Monitored	Emission Factor (EF)		EF Verification Testing Condition	Monitoring and Record Keeping Condition
				Reject Diverter:	PM = 0.0192 lb/hr-opr PM <sub>10</sub> = 0.01 lb/hr-opr PM <sub>2.5</sub> = 0.001 lb/hr-opr		
EU03	Charring and Drying System	PM, PM <sub>10</sub> , PM <sub>2.5</sub>	Char Production (tons)	PM = 5.12 lb/ton PM <sub>10</sub> = 3.43 lb/ton PM <sub>2.5</sub> = 3.43 lb/ton		76	72
			VOC, NOx, SO <sub>2</sub> , CO	VOC = 0.3 lb/ton NOx = 3.9 lb/ton SO <sub>2</sub> = 0.5 lb/ton CO = 0.85 lb/ton		77	72
EU03-1	Alternative Operating Scenario (briquet drying)	PM, PM <sub>10</sub> , PM <sub>2.5</sub>	Briquet Production (tons)	PM = 0.5 lb/ton PM <sub>10</sub> = 0.3 lb/ton PM <sub>2.5</sub> = 0.21 lb/ton		Not Required	72
			VOC, NOx, SO <sub>2</sub> , CO	VOC = 0.214 lb/hr-opr NOx = 3.9 lb/hr-opr SO <sub>2</sub> = 0.023 lb/hr-opr CO = 3.28 lb/hr-opr		Not Required	72
EU03-2	Alternative Operating Scenario (ACC startup burners)	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , VOC, NOx, SO <sub>2</sub> , CO	Actual Hours of Operation Under Alternative Operating Scenario (hr-opr)	PM/PM <sub>10</sub> /PM <sub>2.5</sub> = 0.522 lb/hr-opr VOC = 0.377 lb/hr-opr NOx = 6.34 lb/hr-opr SO <sub>2</sub> = 0.041 lb/hr-opr CO = 4.83 lb/hr-opr		Not Required	72
EU04	Briquet Cooling	PM, PM <sub>10</sub> , PM <sub>2.5</sub>	Briquet Production (tons)	PM = 0.29 lb/ton PM <sub>10</sub> = 0.10 lb/ton PM <sub>2.5</sub> = 0.050 lb/ton		78	72
EU08	Briquet Handling System	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	Actual Hours of Operation (hr-opr)	1.46 lb/hr-opr		78	72
EU10	Combustion Unit	NOx, CO, VOC	Natural Gas Combustion and Actual Hours of Operation (MMSCF and hr-opr)	NOx = 0.328 lb/hr-opr CO = 0.275 lb/hr-opr VOC = 0.0180 lb/hr-opr		Not Required	72
EU11	Solvent Treated Briquet (STB) Operations	VOC	Amount of STB Produced (When ACC is Working and Not Working) (ton-STB)	<u>Solvent Application:</u> 2.82 lb/ton STB (when ACC not working) 0.14 lb/ton STB (when ACC working) <u>Solvent Handling:</u> 1.31 tons/year ("fixed" storage tank and equipment losses) <u>Fines System:</u> 2.02 lb/ton STB		Not Required	72

73. The permittee must determine compliance with the PSELs, except GHGs, by calculating emissions for each emissions unit using the following formula, process parameters measured in Condition 72.c., and the emission factors listed in Condition 72.d.:

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

Where:

E = pollutant emissions in tons/year;

$\sum$  = symbol representing "summation of";

P<sub>eu</sub> = process parameter for each emissions unit identified in Condition 72.c.;

EF<sub>eu</sub> = emission factor identified for each emissions unit and pollutant in Condition 72.d.;

K = conversion constant = 1 ton/2000 lbs for annual emissions calculations.

#### EMISSION FEES

74. Emission fees will be based on the Plant Site Emissions Limits, unless the permittee elects to report actual emissions for one or more permitted processes/pollutants. [LRAPA 34-180 and OAR 340-220-0090]

#### GENERAL TESTING REQUIREMENTS [OAR 340-218-0050(3)(A)]

75. Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with the DEQ's *Source Sampling Manual*. [LRAPA 35-0120, 35-0140, 34-180, and OAR 340-218-0050(3)(a)(B)&(C)]

75.a. Unless otherwise specified by a state or federal regulation, the permittee must submit a source test plan to the LRAPA 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 LRAPA to grant approval and may require EPA approval in addition to approval by LRAPA.

75.b. Only regular operating staff may adjust the processes or emission control device parameters during a compliance source test and within two (2) hours prior to the tests. Any operating adjustments made during a compliance source test, which are a result of consultation during the tests with source testing personnel, equipment vendors or consultants, may render the source test invalid.

75.c. Unless otherwise specified by permit condition or LRAPA approved source test plan, all compliance source tests must be performed as follows:

75.c.i. At least 90% of the design capacity for new or modified equipment;

75.c.ii. At least 90% of the normal maximum operating rate for existing equipment.

75.c.iii. For purposes of this permit, the normal maximum operating rate is defined as the 90th percentile of the average hourly operating rates during a 12 month period immediately preceding the source test. Data supporting the normal maximum operating rate must be included with the source test report.

75.d. Each source test must consist of at least three (3) test runs and the emissions results must be reported as the arithmetic average of all valid test runs. If for reasons beyond the control of the permittee a test run is invalid, LRAPA may accept two (2) test runs for demonstrating compliance with the emission limit or standard.

75.e. Source test reports prepared in accordance with the DEQ's *Source Sampling Manual* must be submitted to LRAPA within 60 days of completing any required source test, unless a different time period is approved in the source test plan submitted prior to the source test.

#### Emission Factor Testing

76. Once during the permit term **by no later than December 31, 2023**, the permittee must conduct testing to verify the emission factors used to calculate PM and PM<sub>10</sub> emissions from EU03 charring and drying system. Compliance with the briquet dryer PM and PM<sub>10</sub> emissions limits during the alternative operating scenario will be presumed based on the use of natural gas in the auxiliary burner and based on the use of good operating and maintenance practices for the burner. Visible emissions monitoring using Modified EPA Method 9 must be conducted during the testing. The permittee must use the following test methods or alternative test methods approved in writing by LRAPA: [LRAPA 33-065(5) and 35-0120(1)(a)]

76.a. Particulate matter emissions using EPA Methods 5 and 202; and

76.b. PM<sub>10</sub> emissions using EPA Method 201A.

77. Once during the permit term **by no later than December 31, 2023**, the permittee must conduct testing to verify the emission factors used to calculate the VOC, NO<sub>x</sub>, SO<sub>2</sub>, and CO emissions from EU03 charring and drying system. The permittee must use the following test methods or alternative test methods approved in writing by LRAPA: [LRAPA 35-0120(1)(a)]

- 77.a. Volatile organic compounds by EPA Method 25A,
- 77.b. Nitrogen oxides by EPA Method 7E,
- 77.c. Sulfur dioxide by EPA Method 6C, and
- 77.d. Carbon monoxide by EPA Method 10.

78. Once during the duration of the permit term **by no later than December 31, 2023**, the permittee must conduct testing to verify the emission factors used to calculate the PM and PM<sub>10</sub> emissions from EU04 briquet cooling and EU08 briquet handling systems. The testing must be performed on the briquette cooler exhausts (4 total). During the testing the permittee must measure and record the monitoring parameters required by Condition 41. Visible emissions monitoring using Modified EPA Method 9 must be conducted during the testing. The permittee must use the following test methods or alternative test methods approved in writing by LRAPA: [LRAPA 33-065(5) and 35-0120(1)(a)]

- 78.a. Particulate matter emissions using EPA Methods 5 and 202, and
- 78.b. PM<sub>10</sub> emissions using EPA Method 201A.

## GENERAL MONITORING AND RECORDKEEPING REQUIREMENTS

### General Monitoring Requirements:

79. The permittee must not knowingly render inaccurate any required monitoring device or method. [LRAPA 34-180 and OAR 340-218-0050(3)(a)(E)]

80. Methods used to determine actual emissions for fee purposes must also be used for compliance determination and can be no less rigorous than the requirements of OAR 340-218-0080. [LRAPA 34-180 and OAR 340-218-0050(3)(a)(F)]

81. Monitoring requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [LRAPA 34-180 and OAR 340-218-0050(3)(a)(G)]

### General Recordkeeping Requirements

82. The permittee must maintain the following general records of testing and monitoring required by this permit: [LRAPA 34-180 and OAR 340-218-0050(3)(b)(A)]

- 82.a. The date, place as defined in the permit, and time of sampling or measurements;
- 82.b. The date(s) analyses were performed;
- 82.c. The company or entity that performed the analyses;
- 82.d. The analytical techniques or methods used;
- 82.e. The results of such analyses;
- 82.f. The operating conditions as existing at the time of sampling or measurement; and
- 82.g. The records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).

83. 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. [LRAPA 34-015, 34-180, 35-0160, and OAR 340-218-0050(3)(b)]

84. Recordkeeping requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [LRAPA 34-180 and OAR 340-218-0050(3)(b)(C)]
85. 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. [LRAPA 34-180 and OAR 340-218-0050(b)(B)]

## REPORTING REQUIREMENTS

### General Reporting Requirements

86. **Excess Emissions Reporting:** The permittee must report all excess emissions as follows: [LRAPA 36-025(1), 34-180, and 340-218-0050(3)(c)]
  - 86.a. Immediately (within one (1) hour of the event) notify LRAPA of an excess emission event by phone, e-mail, or facsimile; and
  - 86.b. Within 15 days of the excess emissions event, submit a written report that contains the following information:
    - 86.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;
    - 86.b.ii. The date and time the owner or operator notified LRAPA of the event;
    - 86.b.iii. The equipment involved;
    - 86.b.iv. Whether the event occurred during planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction, or emergency;
    - 86.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;
    - 86.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);
    - 86.b.vii. The final resolution of the cause of the excess emissions; and
    - 86.b.viii. Where applicable, evidence supporting any claim that emissions in excess of technology-based limits were due to any emergency pursuant to LRAPA 36-040.
  - 86.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 LRAPA by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
  - 86.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 LRAPA for prior authorization, as required LRAPA 36-010 and 36-015. New or modified procedures must be received by LRAPA 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.
  - 86.e. The permittee must notify LRAPA of planned startup/shutdown or scheduled maintenance events.
  - 86.f. The permittee must continue to maintain a log of all excess emissions in accordance with 36-025(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.

87. **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 LRAPA Title 36 must be reported in accordance with Condition 86. [LRAPA 34-180 and OAR 340-218-0050(3)(c)(B)]
88. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5). [LRAPA 34-180 and OAR 340-218-0050(3)(c)(D)]
89. Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit. [LRAPA 34-180 and OAR 340-218-0050(3)(c)(E)]

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

LRAPA  
1010 Main Street  
Springfield, OR 97477

Part 70 Operating Permit Program  
U.S. EPA Region 10  
Mail Stop: OAW-150  
1200 Sixth Avenue, Suite 155  
Seattle, WA 98101

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

90. The permittee must submit three (3) copies of reports of any required monitoring at least every six (6) months, completed on forms approved by LRAPA. 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 LRAPA office. All instances of deviations from permit requirements must be clearly identified in such reports: [LRAPA 34-180, OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]
  - 90.a. The first semi-annual report is due on August 15<sup>th</sup> and must include the semi-annual compliance certification; [LRAPA 34-180 and OAR 340-218-0080]
  - 90.b. The annual report is due on March 1<sup>st</sup> and must consist of the following:
    - 90.b.i. The emission fee report; [LRAPA 34-180 and OAR 340-220-0100]
    - 90.b.ii. A summary of the excess emissions upset log; [LRAPA 36-025]
    - 90.b.iii. The second semi-annual compliance certification; and [LRAPA 34-180 and OAR 340-218-0080]
    - 90.b.iv. The annual report must also include annual greenhouse gas (GHG) emissions in accordance with OAR 340 Division 215. [LRAPA 34-180, OAR 340-215-0010(2) and 340-215-0040]
91. 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): [LRAPA 34-180 and OAR 340-218-0080(6)(c)]
  - 91.a. The identification of each term or condition of the permit that is the basis of the certification;
  - 91.b. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means must include, at a minimum, the methods and means required under OAR 340-218-0050(3). *Note: Certification of compliance with the monitoring conditions in the permit is sufficient to meet this requirement, except when the permittee must certify compliance with new applicable requirements that are incorporated by reference. When certifying compliance with new applicable requirements that are incorporated by reference, the permittee must provide the information required by this condition.* If necessary, the owner or operator 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;

91.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 91.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 LRAPA Title 12, occurred;

91.d. Such other facts as LRAPA may require to determine the compliance status of the source;

91.e. Notwithstanding any other provision contained in any applicable requirement, the owner or operator may use monitoring as required under OAR 340-218-0050(3) and incorporated into the permit, in addition to any specified compliance methods, for the purpose of submitting compliance certifications; and [LRAPA 34-180 and OAR 340-218-0080(6)(e)]

91.f. Number of CAM excursions and corrective action.

#### **NON-APPLICABLE REQUIREMENTS**

92. The following State and Federal air quality requirements are not applicable to this facility for the reasons stated. [LRAPA 34-180 and OAR 340-218-0110(1)(b)]

Rule Citation	Summary	Reason for Not Being Applicable
40 CFR Part 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	The EU10 boiler is rated at less than 10 MMBtu/hr heat input.
40 CFR Part 63, Subpart DDDDD ('5D')	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	These standards do not apply because Kingsford is not, and does not have the potential to be a major source of HAP emissions.
63.11196(a)(1), (b), (c), (d); 63.11201(a), (b), (d); 63.11205(b) and (c); 63.11210 (a), (b), (d), (e); 63.11211, 63.11212, 63.11213, 63.11214(a), (d); 63.11220; 63.11221; 63.11222; 63.11223(c); 63.11224, 63.11225(a)(3) and (5), (e)(3), (6), (7), (e); 63.11226	40 CFR Part 63, Subpart JJJJJ Area Source Requirements for Boilers that are Subject to Emission Limits and Operating Limits.	The boiler at the Kingsford facility is not subject to the area source boiler NESHAP because: the natural gas-fired boiler in EU10 is exempt based upon that fuel, and the EU03 ACC, wood-dryer retort furnace and briquet dryers are not classified as boilers or process heaters because they are not indirectly heated and because the combustion gases come into contact with process materials.
40 CFR Part 60, Subpart CCCC and DDDD	Standards of Performance for Commercial and Industrial Solid Waste Incineration Units	The standard is not applicable because units burning only wood feedstock for the production of charcoal are defined as a "chemical recovery units" in the rule and not incinerators, waste-burning kilns, ERUs or small remote incinerators under subparts CCCC or DDDD.
40 CFR Part 63, Subpart VVVVVV ('6V')	National Emission Standards for Hazardous Air Pollutants for Area Sources: Chemical Manufacturing	The standard is not applicable because the lead (Pb) content of raw materials, products and by-products processed at the plant are

Pages 26-31 redacted -- outside the scope of the SIP