

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

**Western Region  
750 Front Street NE, Suite 120  
Salem, OR 97310  
Telephone: (503) 378-8240**

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

**ISSUED TO:**

**Boise Building Solutions Manufacturing, L.L.C  
P. O. Box 100  
Medford, OR 97501**

**INFORMATION RELIED UPON:**

**Application Number: 018034  
Received: 04/03/2000**

**PLANT SITE LOCATION:**

**North Pacific Highway & Elk St  
Medford, OR 97501**

**LAND USE COMPATIBILITY STATEMENT:**

**Issued by: Jackson County  
Dated: 03/20/1989**

**ISSUED BY THE DEPARTEMENT OF ENVIRONMENTAL QUALITY**

\_\_\_\_\_  
**John Becker, Western Region-Medford, Air Quality  
Manager**

\_\_\_\_\_  
**Date**

Nature of Business: Wood Products Manufacturing (plywood)

Primary SIC: 2436 Plywood manufacturing, greater than 25,000 sq ft/hr  
Other SIC: 4961 Fuel burning equipment inside of AQMA, greater than 30 x 10<sup>6</sup> Btu/hr  
Other SIC: 2421 Sawmill and/or planing mill, 25,000 or more board feet/shift (**dry kilns only**)

RESPONSIBLE  ICIAL

Title: Region Manager

**FACILITY CONTACT PERSON**

Name: Kathy Sperle  
Title: Regional Environmental Engineer  
Phone: (541) 858-6783

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

ACDP	Air Contaminant Discharge Permit	NA	Not applicable
Act	Federal Clean Air Act	NO <sub>x</sub>	Nitrogen oxides
ASTM	American Society of Testing and Materials	O <sub>2</sub>	Oxygen
Btu	British thermal unit	OAR	Oregon Administrative Rules
CFR	Code of Federal Regulations	ODEQ	Oregon Department of Environmental Quality
CO	Carbon Monoxide	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	ppm	Parts per million
FCAA	Federal Clean Air Act	PSEL	Plant Site Emission Limit
FSA	Fuel sampling and analysis	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
I&M	Inspection and maintenance	VMT	Vehicle miles traveled
		VOC	Volatile organic compounds

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

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

**PERMITTED ACTIVITIES**

1. Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from those processes and activities directly related to or associated with air contaminant source(s) in accordance with the requirements, limitations, and conditions of this permit. [OAR 340-218-0010 and 340-218-0120(2)]
2. All conditions in this permit are federally enforceable except as specified below:
  - 2.a. Conditions 10, 11, 40, and G4 are only enforceable by the state. [OAR 340-218-0060]
  - 2.b. Attachment 1 of this permit provides a cross-reference for SIP and Title V program rules that have been renumbered in the current Oregon Administrative Rules. [OAR 340-218-0060 and 340-218-0070]

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

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

Emissions Unit Description	EUID	Pollution Control Device/Practice	PCD ID
Hogged Fuel Boilers 1, 2 and 3	EU1	ESP 1	ESP 1
Veneer Dryers 1, 5, 6 and 7 2, 3, and 4	EU2	RTO-1 RTO-2	RTO-1 RTO-2
Plywood Prod. Building 1; Plywood Presses 1, 2, 3 & 4 and veneer dryer fugitive emissions	EU3a	none	none
Plywood Prod. Building 2; Plywood Presses 5, 6 & 7	EU3b	none	none
Lumber Kilns #1, 2, 3, 4, 5 & 6	EU4	none	none
Baghouses (C & D) and Cyclones (13 & 14)	EU5a	none	none
Baghouses (G, E & F)	EU5b	none	none
Facility-Wide VOCs	EU6	none	none
Material Handling Fugitives	EU506	none	none
Unpaved Roads	EU508	none	none

**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 emissions limits and standards:****Summary of Facility wide emission limits and standards**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition
340-208-0300	4	Fugitive dust	No nuisance	I&M recordkeeping	39
340-240-0180(1)	5	Fugitive emissions	Minimize	Fugitive Emissions Control Plan	39

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition
340-208-0210(2)	9	Fugitives Plan	Minimize	Visible emissions observations	39
340-206-0050	8	SERP	implement SERP	Record Keeping	42
340-208-0300	10	Air contaminants	Not cause a nuisance	Complaint investigation	40
340-208-0450	11	PM >250 $\mu$	No observable deposition off site	Complaint investigation	40
40 CFR Part 68	12	Risk management	Risk management plan	NA	12

4. The permittee shall not cause, suffer, 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 in accordance with 340-208-0300.
5. The permittee shall maintain and implement a site specific plan for the control of fugitive particulate emissions in accordance with 340-240-0180(1).
6. The permittee shall maintain and implement the Operation and Maintenance (O&M) Plans for the following particulate control devices: ESP-1, RTO-1, RTO-2, Baghouses C, D, E, F and G.
  - 6.a. The O & M Plans must be prepared in accordance with OAR 340-240-0190.
  - 6.b. The permittee shall perform and maintain records of operation and maintenance activities in accordance with the Operations and Maintenance Plan.
  - 6.c. The permittee shall maintain records of inspections and maintenance activities including replacement of baghouse bags (when broken and routinely).
  - 6.d. Records shall be retained at the facility and be made available for inspection upon request by the Department.

On an annual basis, the permittee shall review the O&M Plan for any necessary revision as determined by maintenance personnel.
7. The permittee shall not cause to be emitted to ambient air, particulate matter, for any 24-hour average period, in excess of a total from all sources in emissions units EU3a, EU3b, EU5a and EU5b of 77.5 lb/hr in accordance with OAR 340-234-0510(2)(a). Particulate matter emissions shall be measured in accordance with Condition 35.
8. In the event an Air Pollution Alert, Warning, or Emergency Episode is declared in the Medford AQMA by the Department, the permittee shall take the action as stated in the Source Emission Reduction Plan and maintain records as required by Condition 42. During an applicable Air Pollution Episode, this Source Emission Reduction Plan shall be available on the source premises for inspection by Department personnel in accordance with OAR 340-206-0050.


**FUGITIVE EMISSIONS**

9. The permittee must not allow or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but not be limited to the following: [OAR 340-208-0210(2)]
- 9.a. use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
  - 9.b. application of asphalt, oil, water, or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;
  - 9.c. full or partial enclosure of materials stockpiles in cases where application of oil, water, or chemicals are not sufficient to prevent particulate matter from becoming airborne;
  - 9.d. installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
  - 9.e. adequate containment during sandblasting or other similar operations; and
  - 9.f. covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne.

**NUISANCE CONDITIONS**

10. The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by Department personnel. [OAR 340-208-0300] This condition is enforceable only by the State.
11. The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. The Department will verify that the deposition exists and will notify the permittee that the deposition must be controlled. [OAR 340-208-0450] This condition is enforceable only by the State.

**Accidental Release Prevention**

12.  The source become subject to the accidental release prevention regulations in 40 CFR Part 68, then the permittee shall submit a Risk Management Plan (RMP) by the date specified in Section 68.10

**EMISSIONS UNIT SPECIFIC EMISSION LIMITS AND STANDARDS:**

EU ID	Applicable Requirement	Permit Condition	Pollutant/Parameter	Limit/Standard	Monitoring requirements	
					Method	Permit Condition
EU1	340-240-0110(1)(b)	13	Opacity	5%, 3 min. in 60 min.	COMS	44
	40 CFR 60.43b(f)	14	Opacity	20%, 6 min. avg. 27%, one 6 min. avg./hour	COMS	44
	OAR 340-240-0110(3) 40 CFR Part 60.43b(c)(1)	15	PM	LAER = 0.015 gr/dscf @12% CO <sub>2</sub> & 0.10 lb/MMBtu	COMS	33 & 44
	OAR 340-222-0080	16	Fuels	Hogged fuel with no more than 1% by weight waste paper	Recordkeeping	48
EU2	OAR 340-240-0120 (1)(a) OAR 340-240-0120 (1)(b)	17	Opacity	5% average (see below); 10% maximum, 6 min. avg.	VE periodic monitoring	43

	OAR 340-234-0510(1)(e) OAR 340-240-0190	18	Highest and best	minimize emissions	CPMS and O&M recordkeeping	41 and 46
	OAR 340-240-0120(5) OAR 340-240-0190	19	concealing emissions	not allowed	O&M recordkeeping	47
	OAR 340-240-0120(1)(d) OAR 340-240-0190	20	PM	0.30 lb/MSF on 3/8" basis	CPMS and O&M recordkeeping	41 and 46
EU3a	OAR 340-240-0120 (1)(a) OAR 340-240-0120 (1)(b)	17	Opacity	5% average 10% maximum, 6 min. avg.	VE periodic monitoring	43
EU3b	OAR 340-208-0110(2) and 340-208-0110(3)(a)	21	Opacity	20%, 3 min. in 60 min.	VE periodic monitoring	43
EU4	OAR 340-208-0110(2) and 340-208-0110(3)(a)	21	Opacity	20%, 3 min. in 60 min.	VE periodic monitoring	43
EU5a	OAR 340-208-0110(2) and 340-208-0110(3)(a)	21	Opacity	20%, 3 min. in 60 min.	VE periodic monitoring	43
	OAR 340-226-0210(1)(b) OAR 340-240-0190	22	PM	0.1 gr/dscf	VE periodic monitoring and O&M recordkeeping	43 and 49
EU5b	OAR 340-208-0110(2) and 340-208-0110(3)(a)	21	Opacity	20%, 3 min. in 60 min.	VE periodic monitoring	43
	OAR 340-226-0210(1)(b) OAR 340-240-0190	22	PM	0.1 gr/dscf	VE periodic monitoring O&M recordkeeping	43 and 49
EU506 & EU 508	OAR 340-208-0110(2) and 340-208-0110(3)(a)	23	Opacity	20%, 3 min. in 60 min.	VE periodic monitoring	35 and 43

13. The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is equal to or greater than 5% opacity, excluding uncombined water, from emissions unit EU1 (Boilers). [OAR 340-240-0110(1)(b)] Visible emissions shall be measured in accordance with Condition 44.
14. The permittee shall not cause or allow to be discharged into the atmosphere from emissions unit EU1 (boilers) any gases that exhibit greater than 20 percent opacity ( 6 minute average) except for one 6 minute period per hour of not more than 27 percent opacity. [40 CFR 60.43b(f)] Visible emissions shall be measured in accordance with Condition 44.
15. The permittee shall not cause or permit the emission of any particulate matter from emission unit EU1 in excess of 0.015 grains per dry standard cubic foot, corrected to 12% CO<sub>2</sub>. [OAR 340-240-0110(3) and 40 CFR 60.43b(c)(1)] Particulate matter emissions shall be measured in accordance with Condition 33 & 44.
16. The permittee shall burn only hogged fuel, including wood residues generated from the manufacturing process and containing up to 100 pounds per week of (non-hazardous waste) oily residue and resin waste generated on site, <1% by weight paper materials generated by the permittee's Southern Oregon operations, and wood material biomass obtained from other sources. Boiler fuels shall be measured in accordance with Condition 48.
17. The permittee shall not cause or allow the operation of a veneer dryer such that visible air contaminants, excluding uncombined water, emitted from the dryer stack or emission point (EU2 and EU3a) exceed:
- 17.a. An average operating opacity of 5% [OAR 340-240-0120(1)(a)]; or
- 17.b. A maximum opacity of 10% [OAR 340-240-0120(1)(b)].

"Average operating opacity means the opacity of emissions determined using EPA Method 9 on any three days within a 12-month period which are separated from each other by at least 30 days; a violation of the average operating opacity limitation is judged to have occurred if the opacity of emissions on each of the three days is greater than the specified average operating opacity limitation. [OAR 340-234-0010 (5)] "Maximum opacity" means the opacity as determined by EPA Method 9 (average of 24 consecutive observations). [OAR 340-234-0010(21)] Visible emissions shall be measured in accordance with Condition 43.

18. Each veneer dryer shall be maintained and operated at all times such that air contaminant generating processes and all contaminant control equipment shall be at full efficiency and effectiveness so that the emission of air contaminants are kept at the lowest practicable levels. [OAR 340-234-0510(1)(e)]
- 18.a. Compliance with this condition shall be established by demonstrating compliance with Conditions 5 and 6; and;
- 18.b. The permittee shall take corrective action anytime the pollution control device parameter (temperature) on the veneer dryers' RTO control device is less than the following action level: [OAR 340-226-0120]

<b>Parameters</b>	<b>Action level</b>
RTO -1 – Average combustion chamber temperature	< 900 degrees Fahrenheit
RTO -2 – Average combustion chamber temperature (without catalyst)	< 1500 degrees Fahrenheit
RTO -2 – Average combustion temperature for chamber AB (with catalyst)	< 890 degrees Fahrenheit
RTO -2 – Average combustion temperature for chamber CD (with catalyst)	< 816 degrees Fahrenheit

- 18.c. An excursion of the action levels for RTO-1 and RTO-2 parameters shall not be considered a violation of the particulate matter concentration limit in this permit.
- 18.d. For dryers controlled by RTO-1 and RTO-2, the permittee shall take corrective action anytime average combustion chamber temperature on the veneer dryers falls below the corrective action levels indicated in Condition 18.b., or at other temperatures as established by source testing, and Department approval, in accordance with Condition 34. Changes in action levels will be incorporated into the approved monitoring plans by the permittee after the change in the action level is approved by the Department. (OAR 340-226-120).
- 18.e. RTO-1 and RTO-2 shall achieve 95% destruction efficiency for VOC measured as carbon by Method 25A. Alternatively, RTO-1 and RTO-2 will reduce VOC emissions to less than 10 ppm if inlet concentration is less than 100 ppm. Compliance with this condition will be demonstrated by source testing in accordance with Condition 34.
19. The permittee shall not willfully cause or permit the installation or use of any means, such as dilution, which, without resulting in a reduction in the total amount of air contaminants emitted, conceals an emission which would otherwise violate Conditions 17 or 20. [OAR 340-208-0320 and 340-208-400]
20. The permittee shall not cause or allow emission of particulate matter from EU2 to exceed the following limits:
- 20.a. 0.30 lbs/MSF (3/8" basis) of veneer dried from all veneer dryers (OAR 340-240-0120), and
- 20.b. 0.1 grains per dry standard cubic foot from RTO-1 and RTO-2 (OAR 340-226-0210).

- 20.c. Particulate emission shall be monitored in accordance with Conditions 41 and 46.
21. The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is equal to or greater than 20% opacity, excluding uncombined water, for each of the emissions units EU3b, EU4, EU5a, and EU5b. [OAR 340-208-0110(2)] Visible emissions shall be monitored in accordance with Condition 43.
22. The permittee shall not cause or allow the emissions of particulate matter in excess of 0.1 gr/dscf for each of the emissions units EU5a and EU5b. [OAR 340-226-0210(1)(b)] Particulate matter emissions shall be monitored in accordance with Conditions 43 and 49.
23. The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is equal to or greater than 20% opacity, excluding uncombined water, for emissions units EU506 and EU508. [OAR 340-208-0110(2) and 340-208-0110 (3)(a)] Visible emissions shall be monitored in accordance with Conditions 35 and 43.
24. The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is equal to or greater than 20% opacity, excluding uncombined water, from any insignificant source. [OAR 340-208-0110(2) and 340-208-0110 (3)(a)] Visible emissions shall be measured in accordance with Condition 27.
25. The permittee shall not cause or allow the emission of particulate matter, in excess of 0.1 grains per dry standard cubic foot, corrected to 12% CO<sub>2</sub> or 50% excess air, from any fuel burning equipment and refuse burning equipment that are categorically insignificant activities, or any activity included in the aggregate insignificant emissions. [OAR 340-228-0210(1)(b)] Particulate matter emissions shall be measured in accordance with Condition 27.
26. The permittee shall not cause or allow the emission of particulate matter, in excess of 0.1 grain per standard cubic foot, from any non-fugitive air contaminant source other than fuel burning and refuse burning equipment that are categorically insignificant activities, or any activity included in the aggregate insignificant emissions. [OAR 340-226-0210(1)(b)] Particulate matter emissions shall be measured in accordance with Condition 27.

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

27. The Department acknowledges that insignificant emissions units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant emissions as defined in OAR 340-200-0020 exist at facilities required to obtain an Oregon Title V Operating Permit. IEUs must comply with all applicable requirements. In general, the requirements that could apply to IEUs are incorporated as follows:
- 27.a. OAR 340-208-0110 (20% opacity)
- 27.b. OAR 340-226-0210 (0.1 gr/dscf for non-fugitive, non-fuel burning equipment)
- 27.c. OAR 340-226-0310 (process weight limit for non-fugitive, non-fuel burning process equipment)
- 27.d. OAR 340-228-0210 (0.1 gr/dscf corrected to 12% CO<sub>2</sub> or 50% excess air for fuel burning equipment)

**General emissions limits and standards that apply to insignificant activities:**

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/ Standard
OAR 340-208-0110(2) and 340-208-0110 (3)(a)	24	Opacity	20%
340-228-0210(1)(b) (fuel burning)	25	PM/PM <sub>10</sub>	0.1 gr/dscf
340-226-0210(1)(b) (non fuel burning)	26	PM/PM <sub>10</sub>	0.1 gr/dscf

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

**PLANT SITE EMISSION LIMITS**

28. The short term plant site emissions for PM<sub>10</sub> shall not exceed the following [OAR 340-222-0020 and 340-222-0042]:

24.a. PM<sub>10</sub> lbs/day

Current Permitted Daily Emissions	1221
Unassigned Emissions	194
Facility wide PSEL *	1415

\* The unassigned daily PM10 emission of 194 lbs/day are available for internal netting after source applies for and receives Department approval.

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

POLLUTANT	Plant Site Emission Limit (tons/yr)	Unassigned Emissions (tons/yr)
PM***	169	18
PM <sub>10</sub> ***	166	0
CO	2974	13
NO <sub>x</sub> **	253	0
VOC****	231	69
SO <sub>2</sub>	31	1
Pb*	1	NA

\* Pb value is less than 0.1 ton/yr.

\*\* The emission factor for NO<sub>x</sub> emissions from the boilers was returned to the average value supplied by the manufacturer, and used for PSD modeling in 1989, and validated through numerous source tests history since that time.

\*\*\* PM and PM10 components for annual and daily values reflect discontinued Baghouse D, elimination of the planer uncontrolled cyclone, and elimination of log and lumber operations following the 1998 Plywood plant fire. 1 ton per year assigned to EU506.

\*\*\*\* VOC's for EU2, EU3a, EU3b, and EU4 are expressed as Propane and include Methanol and Formaldehyde

- 29.a. The permittee may only use Unassigned Emissions after any necessary construction (OAR 340-218-0190) and permit revision applications (OAR 340-218-0120 through 340-218-0180) have been approved by the Department. If not used by 07/01/07, the unassigned emissions will be reduced to the SER. [OAR 340-222-0045]
- 29.b. Emission reduction credits are available for external offsets until <mo/day/yr> in accordance with OAR 340-268-0030. Emission reduction credits may be used for internal use only after any necessary construction (OAR 340-218-0190) and permit revision applications (OAR 340-218-0120 through 340-218-0180) have been approved by the Department. . If the credits are not used for external offsets or for internal use by <mo/day/yr>, the credits will no longer be available. [OAR 340-268-0030]

## **SPECIAL CONDITIONS**

### **Plywood and Composite Wood Products (PCWP) NESHAP**

30. The permittee is currently subject to the Plywood and Composite Wood Products (PCWP MACT) NESHAP (40 CFR Part 63, Subpart DDDD). Not later than October 1, 2008, the permittee must become a minor source for Hazardous Air Pollutants (HAPs), meet the applicable requirements for the low-risk subcategory specific in Subpart DDDD, Appendix B, or meet the applicable requirements of Subpart DDDD including submission of an application for modification of the permittee's Title V Operating Permit. A summary of these rules is provided as attachment #2 to this permit.

### **Industrial, Commercial, and Institutional Boilers and Process Heaters NESHAP**

31. The permittee is currently subject to the Industrial, Commercial, and Institutional Boilers and Process Heaters NESHAP (40 CFR Part 63, Subpart DDDDD). No later than September 13, 2007, the permittee must become a minor source for Hazardous Air Pollutants (HAPs) or meet the applicable requirements specified in Subpart DDDDD including submission of an application for modification of the permittee's Title V Operating Permit. A summary of these rules is provided as attachment #3 to this permit.

## **TESTING REQUIREMENTS**

32. Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with the Department's Source Sampling Manual. [OAR 340-212-0120] and [40 CFR 60.8 for NSPS]
- 32.a. Unless otherwise specified by a state or federal regulation, the permittee must submit a source test plan to the Department at least 15 days prior to the date of the test or as required in the most current State Source Sampling Manual. The test plan must be prepared in accordance with the Source Sampling Manual and address any planned variations or alternatives to prescribed test methods. The permittee should be aware that if significant variations are requested, it may require more than 30 days for the Department to grant approval and may require EPA approval in addition to approval by the Department.
- 32.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.

- 32.c. Unless otherwise specified by permit condition or Department approved source test plan, all compliance source tests must be performed as follows:
- 32.c.i. at least 90% of the design capacity for new or modified equipment;
  - 32.c.ii. at least 90% of the maximum operating rate for existing equipment; or
  - 32.c.iii. at least 90% 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.
- 32.d. Each source test must consist of at least three (3) test runs and the emissions results must be reported as the arithmetic average of all valid test runs. If for reasons beyond the control of the permittee a test run is invalid, the Department may accept two (2) test runs for demonstrating compliance with the emission limit or standard.
- 32.e. Source test reports prepared in accordance with the Department's Source Sampling Manual must be submitted to the Department within 45 days of completing any required source test, unless a different time period is approved in the source test plan submitted prior to the source test.
33. Oregon DEQ Method 5 and EPA Methods 1 through 4 shall be used for measuring particulate matter emissions from EU1 (Boilers). Test results shall be reported as grains per dry standard cubic feet (gr/dscf), gr/dscf corrected to 12% CO<sub>2</sub>, pounds per hour, and pounds per 1000 pounds of steam produced. Opacity shall be measured concurrently with the Method 5 testing using the facility's continuous opacity monitoring system (COMS). CO and NO<sub>x</sub> emissions shall be measured concurrently with the particulate testing and reported as PPM, pounds per hour, and pounds per thousands pounds of steam production. This testing may also be used to meet the emission factor verification test requirements for these pollutants.
- 33.a. Unless otherwise specified by permit condition or Department approved source test plan, hogged fuel boiler compliance source tests must be performed as follows:
- 33.a.i. at least 90% of the design capacity for new or modified equipment;
  - 33.a.ii. at least 90% of the maximum production capacity for existing equipment; or
  - 33.a.iii. at least 90% 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.
- 33.b. If the process rate during the test is determined by Condition 33.a.iii, the permittee must maintain production records on an hourly basis in addition to any other records that may be required by this permit or an applicable requirement.
- 33.c. The combined boilers shall be tested once each calendar year with at least 8 months between source tests. If two consecutive annual tests, beginning in 2006, result in emissions less than 0.012 gr/dscf @ 12% CO<sub>2</sub>, then no additional testing is required during the term of this permit. [OAR 340-240-0220(1)(a) and (3)]
- 33.d. The steam production rate during the source test shall become the permittee's maximum steaming rate for the boilers (+10% unless prior approval is given in writing by the Department).

- 33.e. A report, including the results of the source test shall be submitted to the Department for review and approval within 45 days of completing the source test, unless otherwise approved by the Department.
- 33.f. During each test run, the permittee shall record the following information:
- 33.f.i. fuel characteristics including moisture content, species, approximate percentage of wood and bark, and the percent by weight that passes a 1/8" sieve;
  - 33.f.ii. the boiler steaming rate (lbs/hr) and excess oxygen (%); and
  - 33.f.iii. opacity, as measured by the COMS;
  - 33.f.iv. control device operating parameters including the ESP voltage on EU1 (Boilers).
34. Oregon DEQ Method 7 and EPA Methods 1 through 4 shall be used for measuring particulate matter emissions from RTO-1 and RTO-2 on emissions unit EU2. Each test run shall be a minimum of 60 minutes long with a minimum sample volume of at least 31.6 dscf. Test results shall be reported as grains per dry standard cubic feet (gr/dscf), pounds per hour, and pounds per 1000 ft<sup>2</sup> on a 3/8" basis (MSF, 3/8") of veneer dried.
- 34.a. Source testing of veneer dryers emissions shall be performed on each pollution control device once in 2008 and again every third year thereafter. [OAR 340-240-0220(1)(b)].
- 34.b. During each test run, the permittee shall record the following information:
- 34.b.i. species/type of veneer dried (i.e. 1/10<sup>th</sup> inch Doug fir/sap);
  - 34.b.ii. amount of gross veneer dried (1000 ft<sup>2</sup>/hr on a 3/8" basis) ;
  - 34.b.iii. amount of redry (%);
  - 34.b.iv. visible emissions as measured in accordance with EPA Method 9 within 30 minutes before, during, or within 30 minutes after each ODEQ Method 7 test run, unless weather conditions are such that it is not possible to read opacity;
  - 34.b.v. dryer conditions including dryer temperatures by zone and drying time;
  - 34.b.vi. RTO combustion chamber temperature (hourly average with at least one reading per minute).
- 34.c. A report, including the results of the source test shall be submitted to the Department for review and approval within 45 days of completing the source test, unless otherwise approved by the Department.
35. Although source testing is not required by this permit for the permit conditions listed below, if source testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods and averaging times to measure the pollutant emissions:

Permit Condition	Test Method	Averaging Time	Special Conditions
21, 23, & 24	Modified EPA Method 9	60 minute observation periods with data reduction modified to demonstrate compliance with an aggregate of three minutes in an 60 minute period.	The test duration may be less than 60 minutes if a violation of the standard is documented before the full 60 minute observation period is completed.
7, 22, 25, & 26	ODEQ Methods 5, 7, or 8	average of three one-hour test runs	ODEQ Method 8 is for sources with exhaust gases at essentially ambient conditions (e.g., material handling cyclones); ODEQ Method 7 is for direct contact combustion sources (e.g., particle and veneer dryers); ODEQ Method 5 is for indirect contact fuel burning equipment (e.g., boilers) and any other source.

## MONITORING REQUIREMENTS

The monitoring conditions in this section are based on OAR 340-218-0050(3)(a); unless otherwise specified.

### General Monitoring Requirements

36. The permittee must not knowingly render inaccurate any required monitoring device or method. [OAR 340-218-0050(3)(a)(E)]
37. 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 340-218-0050(3)(a)(F)]
38. Monitoring requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(a)(G)]

### Facility-wide Monitoring

39. At least once semi-annually, the permittee shall visually survey the facility for a minimum of 30 minutes for any sources of excess fugitive emissions. For the purpose of this survey, excess fugitive emissions are considered to be any visible emissions that leave the plant site boundaries. The person conducting this survey does not have to be EPA Method 9 certified. However, the individual should be familiar with the procedures of EPA Method 9 including using the proper location to observe visible emissions. If sources of excess fugitive emissions are identified during the survey, the permittee shall perform one of the following: [OAR 340-218-0050(3)(a)]
  - 39.a. Immediately take corrective action to minimize the fugitive emissions, including but not limited to those actions identified in Condition 9; or
  - 39.b. Conduct a Modified EPA Method 9 (see page 2 of the permit) test within 24 hours;
  - 39.c. Recordkeeping: The permittee must maintain records of the fugitive emissions surveys, corrective actions (if necessary), and/or the results of any modified EPA Method 9 tests.

- 40. 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 only enforceable by the state. [OAR 340-218-0050(3)(a)]
- 41. The permittee shall perform and maintain records of operation and maintenance activities in accordance with the Operations and Maintenance Plan. These documents shall be retained at the facility. The Operations and Maintenance Plan shall be reviewed at least annually by the permittee and revised as new maintenance procedures are installed. Upon request by the Department, the documents shall be made available for inspection.
- 42. The permittee shall maintain records of all air pollution episodes and emission reduction actions taken in accordance with Condition 8.

**Emissions Unit Specific Emissions Limits and Standards Monitoring**

- 43. The permittee shall monitor visible emissions from emissions units EU2, EU3a, EU3b, EU4, EU5a and EU5b with the following procedures, test methods, and frequencies in accordance with the Department’s Source Sampling Manual. Prior notification and pre-test plan are not required to be submitted to the Department for each test or survey conducted.
  - 43.a. For emission units EU2 and EU3a, EPA Method 9 shall be used to determine opacity.
  - 43.b. For emissions units EU3b, EU4, EU5a, and EU5b, Modified EPA Method 9. Each observation period shall be a minimum of six (6) minutes unless any one reading is greater than the emissions limit for the emissions unit, then the observation period shall be a minimum of 60 minutes or until a violation of the emissions standard has been documented; whichever is a shorter period.
  - 43.c. Visible emissions testing, using EPA Modified Method 9, may be waived for emissions units EU3b, EU4, EU5a, and EU5b provided both of the following conditions are met:
    - i. The permittee shall conduct visible emissions survey using EPA Reference Method 22; and
    - 43.c.ii. Visible emissions, excluding condensed water vapor, from an individual monitoring point are not detected for more than 5% (18 seconds) of the survey time.
  - 43.d. The permittee shall use the following monitoring schedule for conducting the visible emissions tests and/or surveys required by this condition:
    - 43.d.i. The initial monitoring frequency for performing visible emission tests and/or surveys on new emission units is as follows:

Emissions Unit	Frequency
EU2	Weekly
EU3a, EU3b, , EU4, EU5a (cyclones converted to baghouses), and EU5b (baghouses)	Quarterly

- 43.d.ii. If weekly EPA Method 9 visible emissions monitoring shows opacity within the applicable limits specified for EU2 in Condition 17 for at least 6 consecutive observation weeks, the EPA Method 9 tests and/or surveys need only be done once per month.
- 43.d.iii. If monthly EPA Method 9 visible emissions monitoring shows opacity within the applicable limits specified for EU2 in Condition 17 for at least 6 consecutive observation months, the EPA Method 9 tests and/or surveys need only be done once per quarter
- 43.d.iv. If an exceedance occurs, the permittee shall conduct EPA Method 9 testing at least daily. If EPA Method 9 conducted during five (5) consecutive observation days identifies no exceedance, the survey and/or observation frequency can go back to the same frequency as before the exceedance occurred.
- 43.e. All visible emissions tests and surveys shall be conducted during normal operating conditions that have the potential to create visible emissions (e.g., during loading and/or unloading activities).
- 43.f. If the observer is unable to conduct the survey and/or Method 9 tests due to visual interferences caused by other visible emissions sources (e.g., fugitive emissions during high wind conditions) or due to weather conditions such as fog, heavy rain, or snow, the observer shall note such conditions on the data observation sheet and make at least three attempts to conduct the surveys and/or tests at approximately 2 hour intervals throughout the day. The permittee shall attempt to make the observations daily until a valid observation period is completed.
- 43.g. Any observed exceedance shall be recorded in a log, and the cause of the exceedance corrected. Any correction shall also be recorded in the log. The log shall be immediately available upon request to Department inspectors.
- 44. The permittee shall install, calibrate, maintain, and operate a Continuous Opacity Monitoring System (COMS) for measuring the opacity of emissions from emissions unit EU1, as required by 40 CFR 60.48b(a) and OAR 340-240-0210 and Compliance Assurance Monitoring OAR 340-212-0200 and 40 CFR 64.6 (c).
  - 44.a. The permittee shall operate the COMS in accordance with the Department's Continuous Monitoring Manual and CFR 60.13.
  - 44.b. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative (CEM operating log) as required by 40 CFR 60.7
- 45. The permittee shall install, calibrate, maintain, and record the output of Continuous Parametric Monitoring Systems (CPMS) in accordance with the Compliance Assurance Monitoring requirements in OAR 340-212-0200 and 40 CFR 64.6 (c), and according to the Department's Continuous Monitoring Manual and the Department approved monitoring plan for measuring the following:
  - 45.a. Each Boiler steam production (lb/hr);
  - 45.b. Each Boiler excess oxygen (%); and
  - 45.c. Combined Boilers carbon monoxide (lb/hr)

46. The permittee shall maintain, and record the output of the Continuous Parametric Monitoring System (CPMS) for emissions unit EU2 in accordance with the Compliance Assurance Monitoring requirements in OAR 340-212-0200 and 40 CFR 64.6 (c), and according to the Department's Continuous Monitoring Manual and the Department approved monitoring plan for measuring the following: [OAR 340-240-0210]
- 46.a. RTO-1 and RTO-2 combustion chamber temperatures (hourly average obtained from at least one minute readings)
47. The permittee shall maintain records of inspection and maintenance procedures for the ESP on the boilers (EU1) and RTO-1, and RTO-2 on the veneer dryers (EU2).
48. The permittee shall implement and/or continue fuel handling procedures that result in the blending of hogged fuel with paper materials at less than 1%, and less than 100 pounds per week of (non-hazardous waste) oily residue and resin waste generated on site prior to the boiler fuel feed system. The permittee shall maintain monthly records of these measurements and determinations that insure EU1 does not exceed limitations established by Condition 16.
49. The permittee shall maintain records of inspection and maintenance procedures for the baghouses for emissions unit EU5a (baghouses only) and EU5b:
- 49.a. Inspection records of the baghouse bags, recorded on inspection forms.
- 49.b. Maintenance activity records of replacement of baghouse bags on occurrence (when broken and routinely), recorded in a maintenance log.

#### Plant Site Emission Limits Monitoring:

50. The permittee shall determine compliance with the plant site emissions limits using the following monitoring and calculation procedures:

- 50.a. The permittee shall monitor and maintain records of the following process parameters:

Process parameter	Emissions unit(s)	Pollutant(s)	Measurement Technique	Measurement Frequency
Steam production: steam produced by boilers (1000 lb/day)	EU1	PM, PM <sub>10</sub> , CO, NO <sub>x</sub> , SO <sub>2</sub> , and VOC	Steam flow meter	daily
Actual veneer dried by species and/or type (e.g.; Douglas Fir, Pine, White Fir, redry)(MSF/day - 3/8" basis)	EU2	PM, PM <sub>10</sub> , VOC	Production records	daily
Actual plywood pressed (MSF/day - 3/8" basis)	EU3a and EU3b combined EU508	VOC PM/PM <sub>10</sub>	Production records	daily
Board feet dried	EU4	VOC, PM/PM <sub>10</sub>	Production records	monthly
cyclone throughput (lb/BDT, gr/scf)	EU5a, EU5b	PM/PM <sub>10</sub>	Production records	daily
Spray or other marking paint: type, amount (gallons), VOC content (wt%), and density (lb/gal) of coatings	EU6	VOC	Recordkeeping & MSDS	monthly

- 50.b. The permittee shall determine compliance with the PSELs by calculating daily, monthly, and annual emissions for each emissions unit using the following formula, process parameters measured in 50.a, and the emission factors listed in Condition 50.d. Annual PSELs shall be calculated monthly, on a rolling 12 consecutive month basis [OAR 340-222-0080(3)(a)]:

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

where; E = pollutant emissions - lbs/day, lbs/month, or tons/yr  
 $P_{eu}$  = process parameter identified in Condition 50.a.  
 $EF_{eu}$  = emission factor identified for each emissions unit and pollutant in Condition 50.d.  
 K = conversion constant = 1 for daily emissions calculation and 1 ton/2000 lbs for annual emissions calculations.

50.c. Instead of calculating the emissions each day of operation, the permittee may establish process limits, below which the emissions would be less than the PSEL, and monitor only the process rates identified in Condition 50.a. The permittee shall still maintain records to adequately demonstrate compliance with the daily and monthly rolling 12 month total calculated emissions in accordance with 50.b. to determine that the emissions are below the permitted limits.

50.d. Table of emission factors to be used for calculating short and long term emissions:

Emissions unit(s)	Pollutant	Conditions	Emission factor	Emission factor units	Emission factor verification testing	
						Test method
EU1, Blr 1-3	PM	Hogged fuel	0.06	lb/Mlb of steam	yes	ODEQ Method 5
	PM <sub>10</sub>	Hogged fuel	0.06	lb/Mlb of steam	no	NA
	CO	Hogged fuel	4.14, short 3.45, long	lb/Mlb of steam	yes	EPA Method 10
	NO <sub>x</sub>	Hogged fuel	0.26	lb/Mlb of steam	yes	EPA Method 7e
	SO <sub>2</sub>	Hogged fuel	0.2	lb/Mlb of steam	no	NA
	VOC	Hogged fuel	0.11	lb/Mlb of steam	yes	EPA Method 25a
	Pb	Hogged fuel	0.00002	lb/ Mlb of steam	no	NA
EU2	PM/PM <sub>10</sub>	Green veneer	0.30	lb/MSF(3/8" basis)	yes	ODEQ Method 7
	VOC as Carbon	Green veneer	0.1	lb/MSF(3/8" basis)	yes	EPA Method 25a
	VOC as Propane	Green veneer	0.122	lb/MSF(3/8" basis)	no	NA
	Methanol	Green veneer	0.0024	lb/MSF(3/8" basis)	no	NA
	Formaldehyde	Green veneer	0.00225	lb/MSF(3/8" basis)	no	NA
EU3a, EU3b	VOC as Carbon	Plywood	0.059	lb/MSF(3/8" basis)	no	NA
	VOC as Propane	Green veneer	0.072	lb/MSF(3/8" basis)	no	NA
	Methanol	Green veneer	0.043	lb/MSF(3/8" basis)	no	NA
	Formaldehyde	Green veneer	0.0015	lb/MSF(3/8" basis)	no	NA
	PM/PM <sub>10</sub>	Plywood	0.07	lb/MSF (3/8" basis)	no	NA
EU4	VOC as Carbon	Lumber	1.7	lb/Mbf	no	NA

Emissions unit(s)	Pollutant	Conditions	Emission factor	Emission factor units	Emission factor verification testing	
						Test method
EU4 cont.	VOC as Propane	Green veneer	2.074	lb/MSF(3/8" basis)	no	NA
	Methanol	Green veneer	0.065	lb/MSF(3/8" basis)	no	NA
	Formaldehyde	Green veneer	0.0029	lb/MSF(3/8" basis)	no	NA
	PM/PM <sub>10</sub>	Lumber	0.159	lb/Mbf	no	NA
EU5a, EU5b	PM	Cyclones	0.5	lb/BDT	no	NA
		Baghouses G,C,D	0.001	gr/scf	no	NA
		Baghouses E&F	0.04	lb/BDT	no	NA
	PM <sub>10</sub>	Cyclones	0.25	lb/BDT	no	NA
		Baghouses G,C,D	0.001	gr/scf	no	NA
		Baghouses E&F	0.04	lb/BDT	no	NA
EU506	PM	Log debarking	0.045	lb/MBF log scale	no	NA
	PM <sub>10</sub>		0.025	lb/MBF log scale	no	NA
	PM	Cutoff saws	1.0	lb/ton sawdust	no	NA
	PM <sub>10</sub>		0.36	lb/ton sawdust	no	NA
EU508	PM	all traffic	0.013	lb/MSF (3/8" basis plywood)	no	NA
	PM <sub>10</sub>	all traffic	0.005	lb/MSF (3/8" basis plywood)	no	NA

50.e. The permittee shall maintain daily records of hours of operation of RTO-1 and RTO-2 for monitoring and calculation of NO<sub>x</sub>, CO, and SO<sub>2</sub> emissions.

50.f. The emission factors to be used for calculating short and long term emissions for EU2 veneer dryers RTO-1 shall be as follows:

<u>Pollutant</u>	<u>Emission Factor</u>
PM/PM <sub>10</sub>	0.30 lbs/MSF(3/8" basis)
VOC	0.1 lbs/MSF (3/8" basis)
NO <sub>x</sub>	3.6 lbs/hour
CO	9.3 lbs/hour
SO <sub>2</sub>	0.019 lbs/hour (short-term)
	0.013 lbs/hour (long-term)

50.g. The emission factors to be used for calculating short and long term emissions for EU2 veneer dryers RTO-2 shall be as follows:

<u>Pollutant</u>	<u>Emission Factor</u>
PM/PM10	0.30 lbs/MSF (3/8" basis)
VOC	0.1 lbs/MSF (3/8" basis)
NO <sub>x</sub>	4.4 lbs/hour
CO	8 lbs/hour
SO <sub>2</sub>	0.03 lbs/hour (short-term) 0.02 lbs/hour (long-term)

51. The permittee shall conduct emission factor verification tests in accordance with the Department's Source Sampling Manual for the NO<sub>x</sub>, VOC, and CO emission factors listed for emissions units EU1 (Boilers), and VOC emissions factors for emissions unit EU2 (Dryers) using the following test methods and minimum test frequencies:

<b>Emission Unit</b>	<b>Pollutant</b>	<b>Test Method</b>	<b>Minimum Frequency</b>
EU1	NO <sub>x</sub>	EPA Method 7 or 7E	2 times per permit term
	VOC	EPA Method 25A (60 min. test runs)	1 time per permit term
	CO	EPA Method 10	2 times per permit term
EU2	VOC	EPA Method 25A	1 time per permit term

- 51.a. When more than one test is required during the permit term, the tests shall be separated by a minimum period of 8 months.
- 51.b. The permittee shall notify the Department at least 15 days prior to conducting any emission factor verification tests by submitting a source test plan to the Department's regional Source Testing Coordinator. The source test plan shall be prepared in accordance with the Department's Source Sampling Manual.
- 51.c. The permittee shall submit a summary of all emission factor verification tests to the Department's regional Source Testing Coordinator within 45 days of any test. The summary shall include the following information:
- 51.c.i. Emissions unit and monitoring point identification;
- 51.c.ii. Emission results in concentrations (ppm) and as an emission rate (lbs/hr);
- 51.c.iii. Relevant process parameters during the test (e.g., material throughput, types and amounts of fuels, heat input, etc.); and
- 51.c.iv. Relevant control device operating parameters.
- 51.d. Permittee shall perform emission factor verification tests on the veneer dryers RTO-1 and RTO-2 for the following pollutants using the listed test methods:

<u>Pollutant</u>	<u>Test Method</u>
NO <sub>x</sub>	EPA Method 7e
CO	EPA Method 10
VOC	EPA Method 25A

- 51.e. For RTO-1 and RTO-2, the VOC destruction efficiency (DE) shall be demonstrated by using EPA Method 25A or other Method approved by the Department to measure the inlet and outlet VOC emissions. Percent DE shall be calculated as follows:

$$\%DE = [((\text{lbs/hr VOC's inlet}) - (\text{lbs/hr VOC's outlet})) / (\text{lbs/hr VOC's inlet})] \times 100$$

52. The emissions factors listed in Condition 50.d are not enforceable limits unless otherwise specified in this permit. Compliance with PSEs shall only be determined by the calculations contained in Condition 50.c of this permit using the monitored parameters recorded during the reporting period and the emission factors contained in Condition 50.d.
53. A comprehensive Quality Assurance Plan (QAP) for all continuous emissions monitoring shall be maintained by the permittee in accordance with the Department's Continuous Monitoring Manual. The QAP shall include all elements required to insure the integrity of all required emissions monitoring data. At least annually, the Department shall be notified of any changes to the QAP.

## RECORDKEEPING REQUIREMENTS

The recordkeeping conditions in this section are based on OAR 340-218-0050(3)(b); unless otherwise specified.

### General Recordkeeping Requirements

54. The permittee must maintain the following general records of testing and monitoring required by this permit: [OAR 340-218-0050(b)(A)]
- 54.a. the date, place as defined in the permit, and time of sampling or measurements;
  - 54.b. the date(s) analyses were performed;
  - 54.c. the company or entity that performed the analyses;
  - 54.d. the analytical techniques or methods used;
  - 54.e. the results of such analyses;
  - 54.f. the operating conditions as existing at the time of sampling or measurement; and
  - 54.g. the records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibrations drift checks)
55. 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)]
56. Recordkeeping requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(b)(C)]
57. 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)]

### Source Specific Recordkeeping Requirements

58. The permittee shall maintain the following specific records of required monitoring information:
- 58.a. The permittee must maintain records of the fugitive emissions surveys, corrective actions (if necessary), and/or the results of any Modified EPA Method 9 (see page 2 of the permit) tests.
  - 58.b. daily and annual records of steam production by unit;
  - 58.c. monthly records of the percentage of waste paper and oily or resin waste burned in the boilers (EU1) in accordance with Condition 48;
  - 58.d. records of the amounts of each fuel combusted in boiler 3 during each day and the annual capacity factor individually for each type of fuel for each calendar quarter. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. [40 CFR 60.49b(d)] Since only one type of fuel (wood) is burned in the boiler, the annual capacity factor can be determined from actual steam production as compared to the maximum operating capacity. Therefore, it is not necessary that the actual amount of fuel be measured;
  - 58.e. records of the results of the Continuous Opacity Monitoring System and the boiler operating log as required by Condition 44;
  - 58.f. hourly results of continuous monitoring of emissions unit EU1 (Boilers), including opacity, carbon monoxide, oxygen and steam;
  - 58.g. daily and annual EU2 throughput as volume of gross dry veneer, by type and species (MSF - 3/8" basis);
  - 58.h. veneer dryers (EU2) fugitive emissions inspection and corrective action log;
  - 58.i. daily and annual plywood press throughput (MSF - 3/8" basis);
  - 58.j. semi-annual facility fugitive emissions inspection, maintenance and corrective action log;
  - 58.k. visible emissions tests and surveys;
  - 58.l. pollution control device(s) inspection, maintenance, and repair log;
  - 58.m. occurrence and length of downtime for all pollution control devices;
  - 58.n. monthly and annual spray or other marking paint usage (gallons), density (lb/gal), and VOC content (wt.%);
  - 58.o. daily process limits and process rates in accordance with Condition 50.a; and
  - 58.p. facility-wide long term pollutant emissions in accordance with Condition 50.

- 58.q. hourly combustion chamber temperature for RTO-1 and RTO-2 control units on the veneer dryers.
- 58.r. daily and annual hours of operation for emissions unit EU2 veneer dryers RTO-1 and RTO-2.

## REPORTING REQUIREMENTS

The reporting conditions in this section are based on OAR 340-218-0050(3)(c); unless otherwise specified.

### General Reporting Requirements

- 59. Excess Emissions Reporting: The permittee must report all excess emissions in accordance with OAR 340-214-0300 through 340-214-0360. In summary, the permittee must immediately (i.e., as soon as possible but in no case more than one hour after a source knew or should have known of an excess emission period) notify the Department by telephone or in person of any excess emission, other than pre-approved startup, shutdown, or scheduled maintenance. Notification must, to the extent reasonably ascertainable at the time of notification, include the source name, nature of the emissions problem, name of the person making the report, name and telephone number of the contact person for further information, date and time of the onset of the upset condition, whether or not the incident was planned, the cause of the excess emission (e.g., startup, shutdown, maintenance, breakdown, or other), equipment involved in the upset, estimated type and quantity of excess emissions, estimated time of return to normal operations, efforts made to minimize emissions, and a description of remedial actions to be taken. Follow-up reporting must be made in accordance with Department direction and OAR 340-214-0330(2) and 340-214-0340.
  - 59.a. In the event of any excess emissions which are of a nature that could endanger public health and occur during non-business hours, weekends, or holidays, the permittee must immediately notify the Department by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
  - 59.b. If startups, shutdowns, or scheduled maintenance may result in excess emissions, the permittee must submit startup, shutdown, or scheduled maintenance procedures used to minimize excess emissions to the Department for prior authorization, as required in OAR 340-214-0310 and 340-214-0320. New or modified procedures must be received by the Department in writing at least 72 hours prior to the first occurrence of the excess emission event. The permittee must abide by the approved procedures and have a copy available at all times.
  - 59.c. The permittee must notify the Department of planned startup/shutdown or scheduled maintenance events only if required by permit condition or if the source is located in a nonattainment area for a pollutant which may be emitted in excess of applicable standards.
  - 59.d. The permittee must maintain and submit to the Department a log of planned and unplanned excess emissions, on Department approved forms, in accordance with OAR 340-214-0340.
- 60. 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 seven (7) 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 OAR 340-214-0340. [OAR 340-218-0050(3)(c)(B)]
- 61. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5); [OAR 340-218-0050(3)(c)(D)]

62. Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]



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

DEQ Western Region  
750 Front Street NE, Suite 120  
Salem, OR 97301  
(503) 378-8240

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

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-107  
1200 Sixth Avenue  
Seattle, WA 98101

### Monthly, Semi-annual and Annual Reports

63. The permittee shall submit to the Department's Medford office two (2) copies of the monthly monitoring reports for EU1 and EU2 monitoring reports required by Conditions 44, 45 and 46. All monthly reports shall be postmarked by the 30th day following the end of each calendar month. Until further notice, the permittee shall continue to use the monitoring report format currently approved by the Department.
64. The permittee must submit four (4) copies of reports of any required monitoring at least every 6 months, completed on forms approved by the Department. Six month periods are January 1 to June 30, and July 1 to December 31. One copy of the report must be submitted to the Air Quality Division, two copies to the regional office, and one copy to the EPA. 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)]
- 64.a. The first semi-annual report is due on July  and must include the semi-annual compliance certification, OAR 340-218-0080.
- 64.b. The annual report is due on March 1 and must consist of the following:
- 64.b.i. the emission fee report; [OAR 340-220-0100]
  - 64.b.ii. the NO<sub>x</sub> and VOC emission statement, if applicable; [OAR 340-214-0220];
  - 64.b.iii. the excess emissions u  log; [OAR 340-214-0340]
  - 64.b.iv. the second semi-annual compliance certification; and [OAR 340-218-0080]
  - 64.b.v. the annual certification that the risk management plan is being properly implemented; OAR 340-244-0230. [OAR 340-218-0080(7)]
65. 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)]
- 65.a. The identification of each term or condition of the permit that is the basis of the certification;
  - 65.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).

- 65.c. 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;
- 65.d. The status of compliance with terms and conditions of the permit for the period covered by the certification, based on the method or means designated in OAR 340-218-0040(6)(c)(B). 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
- 65.e. Such other facts as the Department may require in order to determine the compliance status of the source.
- 65.f. Notwithstanding any other provision contained in any applicable requirement, the owner or operator may use monitoring as required under OAR 340-218-0050(3) and incorporated into the permit, in addition to any specified compliance methods, for the purpose of submitting compliance certifications. [OAR 340-218-0080(6)(e)]
- 65.g. EU1 and EU2 monitoring reports shall be submitted to the Department's Medford office for every month. All monthly reports shall be postmarked by the 30th day following the end of each calendar month. Until further notice, the permittee shall continue to use the monitoring report format currently approved by the Department.
- 65.h. For emissions unit EU1, the permittee shall submit a visible emissions (opacity) excess emissions report to the Department and EPA Region X for any calendar quarter during which there are excess emissions in accordance with 40 CFR 60.49b(h). If there are no excess emissions during the calendar quarter, the permittee shall submit a report semiannually stating that no excess emissions occurred during the semiannual reporting period. For the purpose of 40 CFR 60.43b, excess emissions are defined as all 6-minute periods during which the average opacity exceeds the opacity standards under 40 CFR 60.43b(f) (permit Condition 10). The excess emission report shall include the following minimum information as required by 40 CFR 60.7(c):
- 65.h.i. The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factor used, and the date and time of commencement and completion of each time period of excess emissions, and the process operating time during the reporting period.
- 65.h.ii. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of emissions unit EU1 and associated control devices. The nature and cause of any malfunction (if known), the corrective actions taken or preventative measures adopted.
- 65.h.iii. The date and time identified for each period during which the continuous monitoring system is inoperative except for zero, span checks, cylinder gas audits, maintenance periods, and the nature of any system repairs or adjustments.
- 65.h.iv. When no excess emissions have occurred, or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information shall be stated in the report.
66. Addresses of regulatory agencies are the following, unless otherwise instructed:

DEQ - Western Region  
221 Stewart Avenue, Suite 201  
Medford, OR 97501  
(541) 776-6010

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

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-107  
1200 Sixth Avenue  
Seattle, WA 98101


## NON-APPLICABLE REQUIREMENTS

67. State and Federal air quality requirements (e.g., rules and regulations) currently determined not applicable to the permittee are listed below along with the reason for the non-applicability: [OAR 340-218-0110]

Applicable Requirement	Reason Code	Applicable Requirement	Reason Code	Applicable Requirement	Reason Code	Applicable Requirement	Reason Code
<b>OAR Chapter 340:</b>							
Division 202		Division 228:		0110 through	e	0230	c
all rules	i	0100	f	0140		0240	c or e
Division 206		0110	f	0210 through	b	0250	c
0050	c	0120	f	0270		0260	c
Division 208		0130	f	0310 through	b	0270	c
0210	c	0200	e	0360		0310	c
0550	c	0210	e	0410 through	b	0320	c or e
0560	c or e	0300	b	0430		0330	c or e
0600	c	Division 230:		0510	b	0340	b or c
0610	c or e	0100 through	e	0520	b	0350	c or e
0630	c or e	0150		0530	b	0360	c
Division 210:		0200 through	e	Division 236:		0410	c
0100 through	b	0230		0120 through	b	0420	c
0120		0310 through	e	0150		0430	c
Division 212:		0360		0220 and	b	0440	c
0210 through	i	0410	e	0230		Division 242:	
0280		Division 232:		0310 through	b	0010 through	c
Division 214:		0040	b or c	0330		0390	
0130(2) and	h	0050	b or c	0410 through	b	0420	c
(3)		0060	b or c	0440		0430	c
0210 and	b	0070	b or c	0500	b	0440	c
0220		0080	b or c	Division 238:		0520	b or c
Division 218:		0085	b or c	0060	e	0620 and	b or c
0050(4)	b	0090	b or c	0070	e	0630	
0050(8)	h	0100	b or c	0080	e	0720 through	b or c
0090	b	0120	b or c	0100	e	0750	
0100	b	0130	b or c	Division 240:		0770 through	b or c
Division 222		0140	b or c	0110	c or e	0790	
0040	h	0150	b or c	0120	c or e	Division 244:	
0042	h	0160	b or c	0130	c or e	0110 through	h
0045	h	0170	b or c	0140	c or e	0180	
0060	h	0180	b or c	0150	b or c	0200	b
0070	h	0190	b or c	0160	c or e	0210	b
0090	h	0200	b or c	0170	b or c	0220	b
Division 226:		0210	b or c	0180	c	0230	b
0310 and	e	0220	b or c	0190	c	Division 256:	
0320		0230	b or c	0200	c	0130	b
0400	h	0240	b or c	0210	c	0200 through	b
		Division 234:		0220	c	0470	

Applicable Requirement	Reason Code	Applicable Requirement	Reason Code	Applicable Requirement	Reason Code	Applicable Requirement	Reason Code
Division 258: 0120 through 0310	b	Part 57	b	appendices		except subpart F	
0400	b	Part 60, except subparts A, and	b	Part 63, except subpart A and appendices	b	Part 85 through 89	b
Division 260: 0030	b	appendixes		Part 72	b		
0040	b	Part 61, except	b	through 76			
Division 268	h	subpart A, M, and		Part 77	b		
<b>40 CFR:</b> Part 55	b			Part 78	b		
				Part 82,	b		

## Reason code definitions:

- a this pollutant is not emitted by the facility
- b the facility is not in this source category
- c the facility is not in a special control/nonattainment area
- d the facility is not in this county
- e the facility does not have this emissions unit
- f the facility does not use this fuel type
- g the rule does not apply because no changes have been made at the facility that would trigger these procedural requirements
- h this method/procedure is not used by the facility
- i this rule applies only to DEQ and regional authorities
- j. there are no emissions units with add-on control devices or the pre-controlled potential emissions are less than 100 tons per year or the emissions units with add-on control devices and pre-controlled emissions greater than 100 tons per year are subject to emissions standards promulgated after November of 1990
- k. 

**GENERAL CONDITIONS****G1. General Provision**

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

**G2. Reference materials**

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

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

**G3. Compliance [OAR 340-218-0040(3)(n)(C), 340-218-0050(6), and 340-218-0080(4)]**

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

**G4. 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]

**G5. 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]

**G6. Certification [OAR 340-214-0110, 340-218-0040(5), 340-218-0050(3)(c)(D), and 340-218-0080(2)]**

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

G7. 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.

G8. 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.

G9. 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.

G10. Permit Shield [OAR 340-218-0110]

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

G11. Inspection and Entry [OAR 340-218-0080(3)]

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

- a. enter upon the permittee's premises where an Oregon Title V Operating Permit program source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- b. have access to and copy, at reasonable times, any records that must be kept under conditions of the permit;

- c. inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. as authorized by the FCAA or state rules, sample or monitor, at reasonable times, substances or parameters, for the purposes of assuring compliance with the permit or applicable requirements.

G12. 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 all regulated air pollutants except for carbon monoxide, any class I or class II substance subject to a standard promulgated under or established by Title VI of the Federal Clean Air Act, or any pollutant that is a regulated air pollutant solely because it is subject to a standard or regulation under section 112(r) of the Federal Clean Air Act. 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 the Department mails the fee invoice or August 1 of the year following the calendar year for which emission fees are paid, whichever is later. Disputes must be submitted in writing to the Department of Environmental Quality. Payment must be made regardless of the dispute. User-based fees will be charged for specific activities (e.g., computer modeling review, ambient monitoring review, etc.) requested by the permittee.

G13. Off-Permit Changes to the Source [OAR 340-218-0140(2)]

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

G14. Section 502(b)(10) Changes to the Source [OAR 340-218-0140(3)]

- a. The permittee must monitor for, and record, any section 502(b)(10) change to the source, which is defined as a change that would contravene an express permit term but would not:
  - i. violate an applicable requirement;
  - ii. contravene a federally enforceable permit term or condition that is a monitoring, recordkeeping, reporting, or compliance certification requirement; or
  - iii. be a Title I modification.
- b. A minimum 7-day advance notification must be submitted to the Department and the EPA in accordance with OAR 340-218-0140(3)(b).
- c. The permit shield of Condition G9 does not extend to section 502(b)(10) changes.

G15. 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.

G16. 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.

G17. 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

G18. Staying Permit Conditions [OAR 340-218-0050(6)(c)]

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

G19. Construction/Operation Modification [OAR 340-218-0190]

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

G20. New Source Review Modification [OAR 340-224-0010]

The permittee may not begin construction of a major source or a major modification of any stationary source without having received an air contaminant discharge permit (ACDP) from the Department and having satisfied the requirements of OAR 340, Division 224.

G21. 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.

G22. Duty to Provide Information [OAR 340-218-0050(6)(e) and OAR 340-214-0110]

The permittee must furnish to the Department, within a reasonable time, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee must also furnish to the Department copies of records required to be retained by the permit or, for information claimed to be confidential, the permittee may furnish such records to the Department along with a claim of confidentiality.

G23. Reopening for Cause [OAR 340-218-0050(6)(c) and 340-218-0200]

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

G24. 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.

G25. Permit Renewal and Expiration [OAR 340-218-0040(1)(a)(D) and 340-218-0130]

- a. This permit expires at the end of its term, unless a timely and complete renewal application is submitted as described below. Permit expiration terminates the permittee's right to operate.
- b. Applications for renewal must be submitted at least 12 months before the expiration of this permit, unless the Department requests an earlier submittal. If more than 12 months is required to process a permit renewal application, the Department must provide no less than six (6) months for the owner or operator to prepare an application.
- c. Provided the permittee submits a timely and complete renewal application, this permit will remain in effect until final action has been taken on the renewal application to issue or deny the permit.

G26. 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).

G27. 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.

G28. 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 the Department or an authorized representative upon request.

ALL INQUIRIES SHOULD BE DIRECTED TO:

Oregon DEQ  
Western Region, Medford Office  
221 Stewart Avenue, Suite 201  
Medford, OR 97501  
(541) 776-6010

**ATTACHMENT 1****Cross-reference from New Rule Numbers to Old Rule Numbers (Effective March 24, 2003)**

<b>New Rule Number</b>	<b>Old Rule Number</b>	<b>New Rule Number</b>	<b>Old Rule Number</b>	<b>New Rule Number</b>	<b>Old Rule Number</b>
208-0110	021-0015	220-0110	028-2660	264-0170	023-0090
208-0200	021-0055	220-0120	028-2670	264-0180	023-0100
208-0210	021-0060	220-0130	028-2680	264-0190	023-0105
214-0300	028-1400	220-0140	028-2690	264-0200	023-0115
214-0310	028-1410	220-0150	028-2700		
214-0320	028-1420	220-0160	028-2710		
214-0330	028-1430	220-0170	028-2720		
214-0340	028-1440	220-0180	028-2730		
214-0350	028-1450	220-0190	028-2740		
214-0360	028-1460	256-0200	024-0100		
218-0010	028-2100	256-0300	024-0300		
218-0020	028-2110	256-0310	024-0306		
218-0040	028-2120	256-0320	024-0307		
218-0050	028-2130	256-0330	024-0308		
218-0060	028-2140	256-0340	024-0309		
218-0070	028-2150	256-0350	024-0312		
218-0080	028-2160	256-0360	024-0314		
218-0090	028-2170	256-0370	024-0318		
218-0100	028-2180	256-0380	024-0320		
218-0110	028-2190	256-0390	024-0325		
218-0120	028-2200	256-0400	024-0330		
218-0130	028-2210	256-0410	024-0332		
218-0140	028-2220	256-0420	024-0335		
218-0150	028-2230	256-0430	024-0337		
218-0160	028-2240	256-0440	024-0340		
218-0170	028-2250	256-0450	024-0355		
218-0180	028-2260	256-0460	024-0357		
218-0190	028-2270	256-0470	024-0360		
218-0200	028-2280	264-0010	023-0022		
218-0210	028-2290	264-0020	023-0025		
218-0220	028-2300	264-0030	023-0030		
218-0230	028-2310	264-0040	023-0035		
218-0240	028-2320	264-0050	023-0040		
218-0250	028-1790	264-0060	023-0042		
220-0010	028-2560	264-0070	023-0043		
220-0030	028-2580	264-0080	023-0045		
220-0040	028-2590	264-0100	023-0055		
220-0050	028-2600	264-0110	023-0060		
220-0060	028-2610	264-0120	023-0065		
220-0070	028-2620	264-0130	023-0070		
220-0080	028-2630	264-0140	023-0075		
220-0090	028-2640	264-0150	023-0080		
220-0100	028-2650	264-0160	023-0085		

