



**OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY**

**GENERAL**

**AIR CONTAMINANT DISCHARGE PERMIT**

Air Quality Division  
Air Operations Section  
700 NE Multnomah St., Suite 600  
Portland, Oregon 97232  
Telephone: (503) 229-5696

This permit is issued in accordance with the provisions of ORS 468A.040 and OAR 340-216-0060

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**ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY**

Signed copy on file with DEQ

December 31, 2019

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Ali Mirzakhali, Air Quality Division Administrator

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Dated

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Wood preserving facilities subject to Part 63, Title 40 of Code of Federal Regulations, Subpart QQQQQQ, as adopted under OAR 340-244-0220.

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## **1.0 PERMIT ASSIGNMENT**

### **1.1. Qualifications**

All of the following conditions must be met in order to qualify for assignment to this General Air Contaminant Discharge Permit (ACDP):

- a. The permittee is performing wood preserving activities as listed on the cover page of this permit using any wood preservative containing chromium, arsenic, dioxins, or methylene chloride;
- b. A Simple or Standard ACDP is not required for the source; and
- c. The source is not having ongoing, recurring or serious compliance problems.

### **1.2. Assignment**

DEQ will assign qualifying permittees to this permit that have and maintain a good record of compliance with DEQ's Air Quality regulations and that DEQ determines would be appropriately regulated by a General ACDP. DEQ may rescind assignment if the permittee no longer meets the requirements of the permit.

### **1.3. Permitted Activities**

Until this permit expires, is modified, or is revoked, the permittee is allowed to discharge air contaminants from processes and activities directly related to or associated with the air contaminant source(s) listed in on the first page of this permit in addition to any categorically insignificant activities, as defined in OAR 340-200-0020, at the source. Discharge of air contaminants from any other equipment or activity not identified herein is not authorized by this permit.

### **1.4. Relation to Local Land Use Laws**

This permit is not valid in Lane County, or at any location where the operation of the permittee's processes, activities, and insignificant activities would be in violation of any local land use or zoning laws. For operation in Lane County, contact Lane Regional Air Protection Agency for any necessary permits at (541) 736-1056. It is the permittee's sole responsibility to obtain local land use approvals as, or where, applicable before operating this facility at any location.

## **2.0 GENERAL EMISSION STANDARDS AND LIMITS**

### **2.1. Visible Emissions**

The permittee must comply with the following visible emission limits, as applicable:

- a. Visible emissions may not equal or exceed an average of 20 percent opacity;
- b. The visible emission limitation in this condition is based upon a six-minute block average of 24 consecutive observations recorded at 15-second intervals as specified in OAR 340-208-0110(2); and
- c. The visible emission standard in this condition does not apply to fugitive emissions from the source.

### **2.2. Fugitive Emissions**

The permittee must comply with the following [OAR 340-208-0210]:

- a. The permittee must take reasonable precautions to prevent particulate matter from becoming airborne from all site operations from which it may be generated. Such reasonable precautions include, but are not limited to:

- i. Controlling vehicle speeds on unpaved roads;
  - ii. Application of water or other suitable chemicals on unpaved roads, material stockpiles, and other surfaces which can create airborne particulate;
  - iii. Full or partial enclosure of material stockpiles in cases where application of water or other suitable chemicals are not sufficient to prevent particulate matter from becoming airborne;
  - iv. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne;
  - v. The prompt removal from paved street of earth or other material that may become airborne;
  - vi. Alternative precautions approved by DEQ.
- b. The permittee must not allow visible fugitive particulate emissions to leave the permittee's property for a period or periods totaling more than 18 seconds in a six-minute period;
  - c. Compliance with the fugitive emissions standard in Condition 2.2.b is determined by EPA Method 22 at the downwind property boundary; and
  - d. If requested by DEQ, the permittee must develop and implement a fugitive emission control plan to prevent any visible emissions from leaving the property of a source for more than 18 seconds in a six-minute period as determined by EPA Method 22.

### **2.3. Particulate Matter Fallout**

The permittee must not cause or permit the deposition of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. [OAR 340-208-0450]

### **2.4. Operation of Pollution Control Devices and Processes**

The permittee must operate and maintain air pollution control devices and emission reduction processes at the highest reasonable efficiency and effectiveness to minimize emissions. Air pollution control devices and components must be in operation and functioning properly at all times when the associated emission source is operating. [OAR 340-226-0120]

### **2.5. Nuisance and Odors**

The permittee must comply with the following nuisance and nuisance odor requirements, as applicable:

- a. The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by DEQ personnel [OAR 340-208-0300]; and
- b. When operating in Clackamas, Columbia, Multnomah, and Washington Counties, control apparatus and equipment, using the highest and best practicable treatment currently available, must be installed and operated to reduce to a minimum odor-bearing gases or odor-bearing particulate matter emitted into the atmosphere.

### **2.6. Fuels and Fuel Sulfur Content**

- a. The permittee must not use any fuels other than natural gas, propane, butane or any of the ASTM grade fuel oils listed below. The sulfur content cannot exceed:
  - i. 0.0015% sulfur by weight for ultra low sulfur diesel;
  - ii. 0.3% sulfur by weight for ASTM Grade 1 distillate oil; [OAR 340-228-0110]
  - iii. 0.5% sulfur by weight for ASTM Grade 2 distillate oil; [OAR 340-228-0110]
  - iv. 1.75% sulfur by weight for residual oil; [OAR 340-228-0100]

- b. The permittee is allowed to use on-specification used oil as fuel which contains no more than 0.5% sulfur by weight. The permittee must obtain analyses from the marketer or, if generated on site, have the used oil analyzed, to demonstrate that each shipment of oil does not exceed the used oil specifications contained in 40 CFR Part 279.11, Table 1. The permittee may not use used oil as fuel that does not meet the used oil specifications in 40 CFR Part 279.11, Table 1. [OAR 340-228-0130]

### **3.0 NESHAP SUBPART 6Q APPLICABILITY**

#### **3.1. 40 C.F.R. Part 63 Subpart QQQQQQ – Wood Preserving**

The permittee must comply with all applicable provisions of 40 C.F.R. 63.11428 – 63.11434 for all affected emissions to which this subpart applies by the applicable date in 40 C.F.R. 63.11429. The permittee must also comply with all applicable provisions of 40 C.F.R. Part 63, Subpart A – NESHAP General Provisions. For a full text of the federal standards, please refer to 40 C.F.R. Part 63, Subpart QQQQQQ and Subpart A.

NESHAP Subpart QQQQQQ is adopted and incorporated by reference in OAR 340-244-0220.

### **4.0 OPERATION AND MAINTENANCE REQUIREMENTS**

#### **4.1. Work Practice Standards**

The permittee must prepare and operate according to a written management practice plan to minimize air emissions from: the preservative treatment of wood, associated storage, handling, and transfer operations of treated wood and preservatives, as well as kiln operations.

The permittee may use written Standard Operating Procedures to meet the requirements for a management practice plan if it includes the minimum activities required for a management practice plan. The management practice plan must include, but is not limited to, the following:

- a. **Minimize Preservative Usage.** The permittee must minimize, to the maximum extent possible, how much preservative is used. The plan must include a description of the minimization practices employed on site;
- b. **Dripping Collection.** The permittee must store treated wood product on drip pads or in a primary containment area that conveys preservative drippage to a collection system until drippage has ceased. The plan must include a description of how the permittee will determine when drippage has ceased and the drippage collection equipment utilized;
- c. **Pressure Treatment.** If the permittee operates a pressure treatment process, the permittee must fully drain the retort to the extent practicable, prior to opening the retort door. The plan must describe drainage practices employed on site;
- d. **Spills.** The permittee must promptly collect any spills. The plan must describe cleanup and collection practices employed on site should a spill occur;
- e. **Storage.** The permittee must store wood preservative chemicals in a manner that minimizes the potential for evaporation or spills. The plan must describe how the permittee will ensure temperatures and conditions remain in compliance with manufacturer or SDS storage recommendations including at least a process for conducting inspections of the stored preservatives at least twice per calendar month. The inspections must, at a minimum, determine compliance with one of the following requirements:
  - i. The plan must briefly describe manufacturer or SDS recommended storage temperatures and conditions for each preservative used on site; or
  - ii. The plan must briefly describe the most conservative temperature and conditions of all preservatives used on site. The permittee may elect to determine which

temperatures and conditions constitute the most conservative and comply with this for all storage tanks.

- f. **Corrective Actions.** The permittee must perform relevant corrective actions or preventative measures in the event of a malfunction before resuming operations. The plan must describe the process or procedures that are followed prior to resuming operations after a malfunction; and
- g. **Lumber Kilns.** If the permittee utilizes any kilns on site for the drying of lumber, the plan must include:
  - i. A description of how the permittee will ensure temperatures do not exceed 200 °F.
  - ii. A description of corrective action steps that will be taken if any kiln has a temperature exceedance.
  - iii. A description of routine or preventative maintenance activities for the kiln(s).

#### 4.2. Lumber Drying Kilns

If the permittee utilizes a kiln to dry lumber, the permittee must not allow any kiln's maximum temperature to exceed 200 °F; and

- a. If a kiln temperature exceeds 200 °F, corrective action must be taken within 60 minutes to return the kiln to a compliant temperature. If kiln temperature cannot be brought back to 200 °F or less within 180 minutes, the kiln must be shut down until repairs or corrective actions are completed; and
- b. The permittee must install and utilize a temperature monitoring device or system to conduct kiln temperature checks at least once every 15 minutes that the kiln is in use.
  - i. The temperature monitoring device or system must be inspected once per year, including maintenance and replacement, if necessary, of thermocouples.

#### 4.3. Pressure Treatment Standards

For any preservative applied with a pressure treatment process, the preservative must be applied to the wood product inside a retort or similarly enclosed vessel.

#### 4.4. Thermal Treatment Standards

For any preservative applied with a thermal treatment process, the preservative must be applied using process treatment tanks equipped with an air scavenging system to control emissions.

#### 4.5. Startup, Shutdown, and Malfunction Provisions

At all times, including periods of startup, shutdown, and malfunction, the permittee must operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the permittee reduce emissions from the source to the greatest extent which is consistent with safety and good air pollution control practices. The general duty to minimize emissions during a period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Malfunctions must be corrected as soon as practicable after their occurrence. To the extent that an unexpected event arises during a startup, shutdown, or malfunction, the permittee must comply by minimizing emissions during such a startup, shutdown, and malfunction event consistent with safety and good air pollution control practices.

## 5.0 PLANT SITE EMISSION LIMITS

### 5.1. Plant Site Emission Limits (PSEL)

The permittee must not cause or allow plant site emissions to exceed the following:

Pollutant	Limit	Units
PM	24	tons per year
PM <sub>10</sub>	14	
PM <sub>2.5</sub>	9	
SO <sub>2</sub>	39	
NO <sub>x</sub>	39	
CO	99	
VOC	39	
GHGs (CO <sub>2</sub> e)	74,000	
Single HAP	9	
Combined HAPs	24	

### 5.2. PM<sub>10</sub> PSEL for Medford-Ashland AQMA

For sources operating in the Medford-Ashland AQMA, the permittee must not cause or allow plant site emissions of PM<sub>10</sub> to exceed the following:

Pollutant	Limit	Units
PM <sub>10</sub>	4.5	tons per year
	49	pounds per day

### 5.3. Annual Period

The annual plant site emissions limits apply to any 12-consecutive calendar month period.

## 6.0 COMPLIANCE DEMONSTRATION

### 6.1. Fuel Sulfur Monitoring

If fuel oil is burned, the permittee must either obtain a certificate from the vendor stating that the fuel sulfur content complies with the limits in Condition 2.6 or have a sample of the fuel analyzed in accordance with the appropriate ASTM analytical procedures. If the permittee has samples analyzed for sulfur, a sample must be collected from the holding tank just after each shipment of oil is added to the tank.

### 6.2. PSEL Compliance Monitoring using Emission Factors

DEQ and the permittee must account for any permit deviations and SSM episodes when determining compliance with the PSELs.

Compliance with the PSEL of Condition 5.0 is determined for each 12-consecutive calendar month period (or daily, as applicable, for sources in the Medford-Ashland AQMA) based on the following calculation for each pollutant except GHGs: [OAR 340-222-0080]

$$E = \Sigma(EF \times P) \times 1 \text{ ton}/2000 \text{ pounds}$$

where:

E = pollutant emissions (tons/yr);

$\Sigma$  = symbol representing “summation of”;

EF = pollutant emission factor (see Condition 12.0);

P = process production

### 6.3. Emission Factors

The permittee must use the default emission factors provided in Condition 12.0 for calculating pollutant emissions, unless alternative emission factors are approved in writing by DEQ. The permittee may request or DEQ may require using alternative emission factors provided they are based on actual test data or other documentation (e.g., AP-42 compilation of emission factors) that has been reviewed and approved by DEQ.

### 6.4. Greenhouse Gas Emissions

The permittee must calculate greenhouse gas emissions to determine compliance with the GHG PSEL by using the following in accordance with Condition 8.3: [OAR 340-215-0040]

- a. DEQ Fuel Combustion Greenhouse Gas Calculator:  
<https://www.oregon.gov/deq/FilterDocs/ghgCalculatorFuelCombust.xlsx>; or
- b. EPA emission quantification methodologies as prescribed in 40 C.F.R. Part 90 subparts E through UU:  
<https://ccdsupport.com/confluence/display/help/Optional+Calculation+Spreadsheet+Instructions>

## 7.0 RECORDKEEPING REQUIREMENTS

### 7.1. NESHAP QQQQQQ Notifications

The permittee must retain a copy of each Initial Notification and each Notification of Compliance Status required by NESHAP QQQQQQ, 40 C.F.R. §63.11432.

### 7.2. Management Practice Plan

The permittee must keep a copy of the complete management practice plan as required by Condition 4.1, including a description of any updates or changes to the plan since it was last submitted to DEQ, for as long as the permittee is assigned to this permit.

The plan or procedures must be retained on site and in a location readily accessible to anybody involved with wood preserving operations.

### 7.3. Fuel Oils

The permittee must keep documentation of sulfur content of all fuel oils used on site in accordance with Condition 6.1.

**7.4. Operation and Maintenance**

The permittee must maintain the following records related to the operation and maintenance of the plant:

- a. All corrective actions, preventative measures, and preventative maintenance conducted on the wood preservation process equipment, air pollution control devices, and associated systems; and
- b. Monthly and annual (and Daily for the Medford/Ashland AQMA) operating parameters as shown in the table below:

<b>Emissions Unit or Activity</b>	<b>Process Parameter</b>	<b>Units</b>
Natural gas-fired boiler(s) or heater(s)	Fuel combusted	Cubic feet (ft <sup>3</sup> )
Propane, butane, or oil-fired boiler(s) or heater(s)	Fuel combusted	Gallons
Wood preservation	Wood preserved using non-conditioning process	Thousand cubic feet (Mft <sup>3</sup> )
	Wood preserved using Boulton process	Thousand cubic feet (Mft <sup>3</sup> )
Wood preservation	Preservative used	Gallons of each
Lumber drying kilns	Lumber dried	Thousand board feet (Mbf) by species
Surface Coating	Material usage	Gallons of each

**7.5. Work Practices**

The permittee must maintain the following records onsite and available to DEQ upon request:

- a. The type of treatment processes performed at the facility (pressure, thermal, non-conditioning, Boulton);
- b. The Safety Data Sheet (or equivalent) for each preservative used on site;
- c. The Safety Data Sheet (or equivalent) for each surface coating used on site;
- d. For the pressure treatment process, maintain charge records identifying pressure reading(s) inside the retort(s) (or similarly enclosed vessel);
- e. For the thermal treatment process, maintain records that the air scavenging system is in place and operated properly during the treatment process. This must include either a signed inspection log for each charge, digital records demonstrating the system is operating during the treatment process, or other equivalent records; and
- f. For any permittee utilizing lumber drying kilns, a file or logbook must be utilized for records associated with Condition 4.2 including:
  - i. Temperature monitoring results;
  - ii. Yearly inspection results;
  - iii. Equipment replacement, repairs, and maintenance performed.

## 7.6. Complaint Log

The permittee must maintain a log of all complaints received that specifically refer to air pollution, odor, or nuisance concerns associated to the permitted facility. The permittee must investigate the condition and provide a response to the complainant within 24 hours, if possible.

The log must include at least the following for each complaint or concern received:

- a. Date and time of complaint receipt;
- b. Date and time of response to complainant;
  - i. If the complaint is not investigated and responded to within 24 hours, the log must state the reason for the delay, the date, and the time the complaint was investigated and responded to.
- c. A description of the permittee's actions to investigate the plant operations and determine validity of the complaint; and
- d. A description of any actions taken in response to the complaint investigation.

## 7.7. Retention of Records

Unless otherwise specified, the permittee must retain all records for a period of at least five (5) years from the date of each report or record and make them available to DEQ upon request. The permittee must maintain the two (2) most recent years of records onsite or otherwise readily available electronically for expeditious review during an on-site inspection.

# 8.0 REPORTING REQUIREMENTS

## 8.1. Annual Report

For each year this permit is in effect, the permittee must submit to DEQ by **February 15** two (2) copies of the following information for the previous calendar year:

- a. The production process parameters listed in Condition 7.4.b;
- b. A copy of the Safety Data Sheet for all preservatives and surface coatings used on site;
- c. A list of retorts (or other containers/units used for conducting wood preservation) on site including a unique identifier;
- d. A brief description of any corrective actions, preventative measures, and preventative maintenance conducted on the treatment process equipment, air pollution control devices, and associated systems including the date(s) performed;
- e. Identification as to which process listed in Condition 12.2 best aligns with facility operations (treatment without conditioning or Boulton);
- f. A statement certifying whether all management practice plan requirements in Condition 4.1 have been complied with; and
  - i. Description of any changes to the management practice plan or plant site standard operating procedures.
- g. Type of treatment processes performed at the facility (e.g. pressure or thermal);
- h. Summary of complaints relating to air quality received by permittee during the year;
- i. A description, or negative declaration, of any permit deviations or malfunctions that had potential to cause an increase in emissions; and
- j. List of changes made in plant processes, production levels, equipment changes, materials used, and pollution control equipment. Identify which changes affected air contaminant emissions.

## 8.2. Deviation Report

The permittee must report any deviation from the requirements of this permit within 30 days of the deviation.

## 8.3. Greenhouse Gas Registration and Reporting

If the calendar year greenhouse gas emissions (CO<sub>2</sub>e) are ever greater than or equal to 2,756 tons (2,500 metric tons), the permittee must annually register and report its greenhouse gas emissions with DEQ in accordance with OAR 340 division 215.

If the calendar year greenhouse gas emissions (CO<sub>2</sub>e) are less than 2,756 tons (2,500 metric tons) for three consecutive years, the permittee may stop reporting greenhouse gas emissions but must retain all records used to calculate greenhouse gas emissions in accordance with OAR 340 division 215 following the last year that they were required to report. The permittee must resume reporting its greenhouse gas emissions if the calendar year greenhouse gas emissions (CO<sub>2</sub>e) are greater than or equal to 2,756 tons (2,500 metric tons) in any subsequent calendar year.

## 8.4. Initial Startup Notice

The permittee must notify DEQ in writing of the date a newly permitted source is first brought into normal operation. The notification must be submitted no later than seven (7) days after the initial startup.

## 8.5. Notice of Change of Ownership or Company Name

The permittee must notify DEQ in writing using a DEQ “Transfer Application Form” within 60 days after the following:

- a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
- b. Sale or exchange of the activity or facility.

## 8.6. Construction or Modification Notices

The permittee must notify DEQ in writing using a DEQ “Notice of Intent to Construct Form,” or other permit application form and obtain approval in accordance with OAR 340-210-0205 through 340-210-0250 before:

- a. Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions;
- b. Making any physical change or change in operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or
- c. Constructing or modifying any air pollution control equipment.

# 9.0 ADMINISTRATIVE REQUIREMENTS

## 9.1. Employee Commute Options

**Sources located inside the Portland Air Quality Maintenance Area (AQMA) with more than 100 employees at a work site** must comply with the Employee Commute Options Program requirements located in OAR 340-242-0020 through 340-242-0390.

For forms (Fact Sheet, Registration, or Survey Guidance documents) or questions regarding ECO, please contact the ECO program directly at 503-229-6154 or [ECO@deq.state.or.us](mailto:ECO@deq.state.or.us).

Additional information is available from DEQ’s website for the ECO program located here:

<https://www.oregon.gov/deq/air/programs/Pages/ECO.aspx>

**9.2. Reassignment to the General ACDP**

A permittee that wishes to continue assignment to this General ACDP must submit to DEQ an application for reassignment.

- a. The application must be received by DEQ within 30 days prior to the expiration date listed on this permit;
- b. The application must be sent to the appropriate regional office identified in Condition 9.3; and
- c. The permittee may submit an application for either a Simple or Standard ACDP at any time, but the permittee must continue to comply with the General ACDP until DEQ takes final action on the Simple or Standard ACDP application.

**9.3. Permit Coordinator Addresses**

All reports, notices, and applications should be directed to the Permit Coordinator for the area where the source is located unless otherwise specified. The Permit Coordinator addresses are as follows:

<b>Counties</b>	<b>Permit Coordinator Address and Telephone</b>
Clackamas, Clatsop, Columbia, Multnomah, Tillamook, and Washington	Department of Environmental Quality Northwest Region 700 NE Multnomah Street, Suite 600 Portland, OR 97232 Telephone: (503) 229-5696
Benton, Coos, Curry, Douglas, Jackson, Josephine, Lincoln, Linn, Marion, Polk, and Yamhill	Department of Environmental Quality Western Region 4026 Fairview Industrial Drive Salem, OR 97302 Telephone: (503) 378-8240
Baker, Crook, Deschutes, Gilliam, Grant, Harney, Hood River, Jefferson, Klamath, Lake, Malheur, Morrow, Sherman, Umatilla, Union, Wallowa, Wasco, and Wheeler.	Department of Environmental Quality Eastern Region 475 NE Bellevue, Suite 110 Bend, OR 97701 Telephone: (541) 388-6146

**9.4. DEQ Contacts**

Information about air quality permits and DEQ's regulations may be obtained from the DEQ web page at [www.deq.state.or.us](http://www.deq.state.or.us). All inquiries about this permit should be directed to the regional office for the area where the source is located. DEQ's regional offices are as follows:

<b>Counties</b>	<b>Office Address and Telephone</b>
Clackamas, Clatsop, Columbia, Multnomah, Tillamook, and Washington	Department of Environmental Quality Portland Office 700 NE Multnomah Street, Suite 600 Portland, OR 97232 Telephone: (503) 229-5696
Benton, Lincoln, Linn, Marion, Polk, and Yamhill	Department of Environmental Quality Salem Office 4026 Fairview Industrial Drive Salem, OR 97302

	Telephone: (503) 378-8240
Coos, Curry, and Western Douglas	Department of Environmental Quality Coos Bay Office 381 N Second Street Coos Bay, OR 97420 Telephone: (541) 269-2721
Eastern Douglas, Jackson, and Josephine	Department of Environmental Quality Medford Office 221 Stewart Ave. Suite 201 Medford, OR 97501 Telephone: (541) 776-6010
Crook, Deschutes, Harney, Hood River, Jefferson, Klamath, Lake, Sherman, Wasco, and Wheeler	Department of Environmental Quality Bend Office 475 NE Bellevue, Suite 110 Bend, OR 97701 Telephone: (541) 388-6146
Baker, Gilliam, Grant, Malheur, Morrow, Umatilla, Union, and Wallowa	Department of Environmental Quality Pendleton Office 800 SE Emigrant Ave., Suite 330 Pendleton, OR 97801 Telephone: (541) 276-4063

## 10.0 FEES

### 10.1. Annual Compliance Fees

The permittee must pay the annual fees specified in OAR 340-216-8020, Table 2 by **December 1** of each year this permit is in effect. Invoices indicating the amount, as determined by DEQ regulations, will be mailed prior to the above date. **Late fees in accordance with Part 5 of the table will be assessed as appropriate.**

### 10.2. Change of Ownership or Company Name Fee

The permittee must pay the non-technical permit modification fee specified in OAR 340-216-8020, Table 2, Part 4 with an application for changing the ownership or the name of the company assigned to this permit.

### 10.3. Where to Submit Fees

The permittee must submit payments for invoices, applications that are accompanied by fees, and any other payments to DEQ's Business Office:

Oregon Dept. of Environmental Quality  
Financial Services – Revenue Section  
700 NE Multnomah St., Suite 600  
Portland, Oregon 97232-4100

## 11.0 GENERAL CONDITIONS AND DISCLAIMERS

### 11.1. Other Regulations

In addition to the specific requirements listed in this permit, the permittee must comply with all other applicable legal requirements enforceable by DEQ.

**11.2. Conflicting Conditions**

In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.

**11.3. Masking of Emissions**

The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions 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]

**11.4. DEQ Access**

The permittee must allow DEQ's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468.095.

**11.5. Permit Availability**

The permittee must have a copy of the permit available at the facility at all times.

**11.6. Open Burning**

The permittee may not conduct any open burning except as allowed by OAR 340, division 264.

**11.7. Asbestos**

The permittee must comply with the asbestos abatement requirements in OAR 340, division 248 for all activities involving asbestos-containing materials, including, but not limited to, demolition, renovation, repair, construction, and maintenance.

**11.8. Property Rights**

The issuance of this 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.

**11.9. Permit Termination, Revocation, or Modification**

DEQ may modify or revoke this permit as authorized under OAR chapter 340 division 216.

**12.0 EMISSION FACTORS**

This section contains emission factors for both criteria pollutants and hazardous air pollutants (HAPs). Because many HAP emission factors remain under development, the emission factors provided in Condition 12.0 represent the best available data at the time of permit renewal. The use of HAP emission factors in Condition 12.0 do not guarantee that facilities will be in compliance with federal requirements for major sources of HAPs. Facilities should use the factors below or provide emission source test results that demonstrate actual emissions for their specific emission unit.

**12.1. Emission Factors (EF) for Fuel Usage**

- a. PM, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC

Fuel type	EF units	PM	PM <sub>10</sub> /PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
Natural Gas	lb/million cubic feet	2.5	2.5	1.7	100	84	5.5
Propane	lb/1000 gallons	0.6	0.6	0.10S <sup>(1)</sup>	19	3.2	0.5
Butane	lb/1000 gallons	0.6	0.6	0.09S <sup>(1)</sup>	21	3.6	0.6

Fuel type	EF units	PM	PM <sub>10</sub> /PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
#1 distillate oil	lb/1000 gallons	3.3	1.7 <sup>(2)</sup>	142S <sup>(1)</sup>	18	5	0.2 <sup>(3)</sup>
#2 distillate oil	lb/1000 gallons	3.3	1.7 <sup>(2)</sup>	142S <sup>(1)</sup>	20	5	0.2 <sup>(3)</sup>
#4 residual oil	lb/1000 gallons	8.5	7.3 <sup>(4)</sup>	150S <sup>(1)</sup>	20	5	0.2 <sup>(3)</sup>
#5 & #6 residual oil	lb/1000 gallons	11.5	9.9 <sup>(4)</sup>	157S <sup>(1)</sup>	55	5	0.28 <sup>(3)</sup>

(1) The sulfur dioxide emission factor is based on the sulfur content of the fuel expressed as a percent by weight. For example, if the sulfur content of #1 distillate oil is 0.3%, the emission factor is  $142 \times 0.3 = 42.6$  lb/1000 gallons of oil burned.

(2) PM<sub>10</sub> is 50% of total PM. Total PM is the sum of filterable PM and condensible PM. [AP-42 tables 1.3-1, 1.3-2, and 1.3-6]

(3) VOC reported as non-methane total organic carbon (NMTOC).

(4) PM<sub>10</sub> is 86% of total PM. Total PM is the sum of filterable PM and condensible PM. [AP-42 tables 1.3-1, 1.3-2, and 1.3-5]

## 12.2. Emission Factors for Wood Preserving

Emissions device or activity	Pollutant	Emission Factor (EF)	Emission factor units
Treatment cycle without conditioning, uncontrolled	VOC	0.74	lb/1000ft <sup>3</sup> of wood treated
	Naphthalene (Single HAP)	0.0046	lb/1000ft <sup>3</sup> of wood treated
	Combined HAPs	0.0097	lb/1000ft <sup>3</sup> of wood treated
Treatment cycle with conditioning by Boulton process, uncontrolled	VOC	5.80	lb/1000ft <sup>3</sup> of wood treated
	Naphthalene (Single HAP)	0.079	lb/1000ft <sup>3</sup> of wood treated
	Combined HAPs	0.16	lb/1000ft <sup>3</sup> of wood treated

## 12.3. Emission Factors for Lumber Drying Kilns (lb/1000 board feet)

Wood species	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	VOC	Methanol (Single HAP)	Acetaldehyde (Single HAP)	Combined HAP
Ponderosa Pine	0.02	2.345	0.074	0.042	0.127
Lodgepole Pine	0.02	1.529	0.063	0.042	0.116
Douglas Fir	0.02	1.158	0.069	0.068	0.141
White Fir	0.05	0.839	0.148	0.055	0.211
Hemlock	0.05	0.525	0.148	0.138	0.292
Western Red Cedar	0.05	0.363	0.148	0.138	0.294
Engelmann Spruce	0.02	0.178	0.025	0.036	0.064
Larch	0.02	1.158	0.069	0.068	0.141
Western White Pine	0.02	2.851	0.074	0.042	0.127

**13.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS**

ACDP	Air Contaminant Discharge Permit	PCD	pollution control device
ASTM	American Society for Testing and Materials	PM	particulate matter
AQMA	Air Quality Maintenance Area	PM <sub>10</sub>	particulate matter less than 10 microns in size
calendar year	The 12-month period beginning January 1st and ending December 31 <sup>st</sup>	PM <sub>2.5</sub>	particulate matter less than 2.5 microns in size
CAO	Cleaner Air Oregon	ppm	part per million
CFR	Code of Federal Regulations	PSD	Prevention of Significant Deterioration
CO	carbon monoxide	PSEL	Plant Site Emission Limit
CO <sub>2e</sub>	carbon dioxide equivalent	PTE	Potential to Emit
DEQ	Oregon Department of Environmental Quality	RACT	Reasonably Available Control Technology
dscf	dry standard cubic foot	scf	standard cubic foot
EPA	US Environmental Protection Agency	SER	Significant Emission Rate
FCAA	Federal Clean Air Act	SDS	Safety Data Sheet
Gal	gallon(s)	SIC	Standard Industrial Code
GHG	greenhouse gas	SIP	State Implementation Plan
gr/dscf	grains per dry standard cubic foot	SO <sub>2</sub>	sulfur dioxide
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040	SSM	Startup, Shutdown, and Malfunction
I&M	inspection and maintenance	Special Control Area	as defined in OAR 340-204-0070
lb	pound(s)	TACT	Typically Achievable Control Technology
Mbf	Thousand board feet	VE	visible emissions
MMBtu	million British thermal units	VOC	volatile organic compound
NA	not applicable	year	A period consisting of any 12-consecutive calendar months
NESHAP	National Emissions Standards for Hazardous Air Pollutants		
NO <sub>x</sub>	nitrogen oxides		
NSPS	New Source Performance Standard		
NSR	New Source Review		
O <sub>2</sub>	oxygen		
OAR	Oregon Administrative Rules		
ORS	Oregon Revised Statutes		
O&M	operation and maintenance		
Pb	lead		

Term	Definition
Air Scavenging System	An air collection and control system that collects and removes vapors from a thermal treatment process vessel and vents the emissions to a vapor recovery tank that collects condensate from the vapors.
Boulton Treatment and 'Non-conditioning' Treatment	<p>Boulton treatment, or boiling under vacuum, is a process by which the cylinder is charged with wood, heated preservative is used to heat the wood charge, and a vacuum is drawn. This process is used to 'condition' the wood by removing excess moisture and allowing better preservative penetration.</p> <p>'Non-conditioning' treatment is wood that is treated with preservative without using the aforementioned 'boulton' process.</p>
Deviation	Any instance in which a permittee fails to meet a requirement or condition of this permit.
Pressure Treatment Process	A wood treatment process involving an enclosed vessel, usually a retort, and the application of pneumatic or hydrostatic pressure to expedite the movement of preservative liquid into the wood.
Retort	An airtight pressure vessel, typically a long horizontal cylinder, used for the pressure impregnation of wood products with a liquid wood preservative.
Thermal Treatment Process	A non-pressurized wood treatment process where the wood is exposed to a heated preservative.
Wood Preserving	The pressure or thermal impregnation of chemicals into wood to provide effective long-term resistance to attack by fungi, bacteria, insects, and marine borers.