

Department of Environmental Quality
Air Quality Program

GENERAL
AIR CONTAMINANT DISCHARGE PERMIT
ASSESSMENT REPORT
WOOD PRESERVING FACILITIES

SOURCE DESCRIPTION AND QUALIFICATION

1. This General Permit is designed to regulate air contaminant emissions from wood preserving facilities subject the Wood Preserving National Emission Standards for Hazardous Air Pollutants (40 C.F.R. part 63 subpart QQQQQQ). The Wood Preserving NESHAP regulates wood preserving operations that use any wood preservative containing chromium, arsenic, dioxins, or methylene chloride. DEQ understands that creosote does not contain chromium, arsenic, dioxins, or methylene chloride.
2. The previous version of this General ACDP included references and emission factors for wood-fired boilers. NESHAP JJJJJJ, which would likely apply to a source using a wood-fired boiler, was promulgated in 2011. A source with a wood-fired boiler is subject to requirements that are not included in this permit and are required to obtain a General ACDP attachment, Simple, or Standard ACDP.
3. The facilities assigned to this General Permit may not emit any other air pollution that requires regulation beyond that specified in this permit, except for other pollution emissions that also qualify for assignment and are assigned to other General Permits and categorically insignificant activities defined by OAR Chapter 340 Division 200. A facility that has experienced recurring or serious compliance problems is not eligible for assignment to this permit.

ASSESSMENT OF EMISSIONS

4. Facilities assigned to this General Permit emit criteria pollutants and are sources of hazardous air pollutant (HAP) emissions.
5. DEQ has assessed the level of emissions of air pollutants from these facilities and determined that facilities complying with the operational limits and monitoring requirements of this permit are in compliance with applicable provisions of the NESHAP and have emissions below the Plant Site Emissions Limits.
6. Emission factors for kilns provided within the permit were derived from the following sources:
OSU Kiln Study, 1998 (WI)
EPA Region 10 HAP and VOC Emission Factors for Lumber Drying, December 2012
PM/PM10 factors for Ponderosa Pine, Lodgepole Pine, Engelmann Spruce, Larch, and Western White Pine defer to Douglas Fir emission factors.

PM/PM10 factors for White Fir and Western Red Cedar defer to Hemlock emission factors.

SPECIFIC AIR PROGRAM APPLICABILITY

7. Facilities assigned to this General Permit are subject to the general visible emissions standards and nuisance requirements (control of fugitive particulate emissions and odors) in OAR Chapter 340, Division 208. The permit contains requirements and limitations to ensure compliance with these standards. The particulate matter emission limits in OAR Chapter 340, Division 226 are not applicable to these facilities because the emissions, if any, are fugitives, which cannot be measured using standard test methods.
8. Facilities assigned to this General Permit are subject to 40 CFR part 63 subpart QQQQQQ as adopted in OAR 340, Division 244. The permit contains requirements and limitations to ensure compliance with these standards.

COMPLIANCE ASSURANCE

9. Permittees are required to maintain records of a site-specific management practice plan, fuel(s) used, operation and maintenance work, production parameters, work practices, and complaints. Some of these items are reported annually, but must be available to DEQ upon request.
10. DEQ staff members review annual report submittals every year and perform site inspections of the permitted facilities on a routine basis; inspections may be performed more frequently if complaints are received.

REVOCAION OF ASSIGNMENT

11. Any facility that fails to demonstrate compliance or fails to conform to the requirements and limitations contained in the permit may have its assignment to the General Permit revoked. The facility would then be subject to a more stringent level of permitting.

PUBLIC NOTICE

12. General Air Contaminant Discharge Permits are authorized by Oregon Administrative Rules and are part of the State Implementation Plan. As part of the General ACDP issuance process under OAR chapter 340, division 209, the public was provided at least 30 days to submit written comments. DEQ reviewed all comments and has made several changes in response to the comments.

AQGP-024r, wood preserving
11/18/09; Updated: DRD 10/08/19;