

Department of Environmental Quality  
Air Quality Program

GENERAL  
AIR CONTAMINANT DISCHARGE PERMIT  
ASSESSMENT REPORT

WOOD PRODUCTS

SOURCE DESCRIPTION AND QUALIFICATION

1. This General Permit is designed to regulate air contaminant emissions from wood products facilities, including sawmills, planing mills, millwork facilities, veneer peeling, veneer drying, and plywood production facilities.
2. The facilities assigned to this General Permit have no other air pollution sources which require regulation beyond that specified in this permit, or have other pollution sources that also qualify for General Permits. Facilities eligible for assignment to this permit have not experienced recurring or serious compliance problems.

ASSESSMENT OF EMISSIONS

3. Facilities assigned to this General Permit are primarily sources of PM and PM<sub>10</sub>. Many of the facilities have boilers for producing steam that is used in the production processes. Boilers are also sources of PM and PM<sub>10</sub>, as well as SO<sub>2</sub>, CO, NO<sub>x</sub>, and VOC emissions. The type of fuel (wood, natural gas or oil) used in boilers affects the levels of these emissions, as will drying kilns and surface coating operations. Some facilities have lumber drying kilns and/or coating (painting) operations that are also sources of VOC. Source coating operations may also emit hazardous air pollutants (HAPs).
4. The Department has assessed the level of emissions of all air pollutants from these facilities and determined that facilities complying with the operational limits and monitoring requirements of this permit have emission levels below the established levels of concern stated in Tables 2 and 3 of OAR 340-200-0020.

SPECIFIC AIR PROGRAM APPLICABILITY

5. Facilities assigned to this General Permit are subject to the general visible emissions standards, nuisance requirements (control of fugitive dust and odors), particulate matter standards, and fuel sulfur limits in OAR Chapter 340, Divisions 208, 226, and 228. The permit contains requirements and limitations to ensure compliance with these standards.
6. Some of the facilities assigned to this General Permit may have veneer dryers that are subject to the visible emissions and particulate matter limits in OAR 340-234-0510 (state

wide limits) or OAR 340-240-0120 (Medford-Ashland AQMA limits). The permit contains requirements and limitations to ensure compliance with these standards.

7. Some of the facilities assigned to this General Permit are subject to federal New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units found in Title 40, Code of Federal Regulations, Part 60, Subpart Dc. Facilities for which construction, modification, or reconstruction was commenced after June 9, 1989 are subject to these federal requirements, which include sulfur limits for fuel oil. The permit contains requirements and limitations to ensure compliance with these federal standards.

#### COMPLIANCE ASSURANCE

8. Permittees are required to demonstrate compliance with the emission limits for wood fired boilers by conducting a stack source test within 2 years after being assigned to the permit.
9. Permittees are required to maintain records of production, fuel use, upset conditions, and complaints received at the facility. These items are reported to the Department annually.
10. Department staff members perform site inspections of the permitted facilities on a routine basis, and more frequently if complaints are received.

#### REVOCAION OF ASSIGNMENT

11. Any facility that fails to demonstrate compliance, generates complaints, 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 higher, more stringent level of permitting.

#### PUBLIC NOTICE

12. General Air Contaminant Discharge Permits are incorporated into the Oregon Administrative Rules by reference and are part of the State Implementation Plan. As part of the rulemaking process, the public will be provided at least 30 days to submit written comments or may provide oral testimony at a public hearing that will be held at the end of the comment period in different locations throughout the state. Notice of when and where the hearings will be held will be provided at least 30 days in advance of the hearings. The Department will review any comments and may modify the permits in response to the comments. The final permits will be issued after approval by the Environmental Quality Commission.