

Department of Environmental Quality
 Northwest Region
 Air Quality Program

Simple
 AIR CONTAMINANT DISCHARGE PERMIT
 REVIEW REPORT

West Oregon Wood Products
 162 Commerce Street
 Banks, Oregon
 503-397-6707

| | |
|----------------------|---|
| Unassigned emissions | |
| Emission credits | |
| Source test | |
| COMS | |
| CEMS | |
| Compliance schedule | |
| Special conditions | |
| Annual report | X |
| Semi-annual report | |
| Quarterly report | |

| | |
|-------------------------|--------|
| Monthly report | |
| Excess emissions report | |
| NSPS | |
| NESHAP | |
| NSR | |
| PSD | |
| RACT | |
| FCE | |
| Public Notice | Cat II |

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PERMITTING

PERMITTING ACTION

1. The proposed permit is a new permit for a new source.

OTHER PERMITS

2. No other permits have been issued or are required by the Department of Environmental Quality for this source.

ATTAINMENT STATUS

3. The source is located in a maintenance area for CO and Ozone, and an attainment area for all other criteria pollutants.

SOURCE DESCRIPTION

OVERVIEW

4. The permittee proposes to build and operate a Wood Pellet Manufacturing facility.

PROCESS AND CONTROL DEVICES

5. Proposed air contaminant sources at the facility consist of the following:
 - a. One natural gas and wood dust fired burner will heat a rotary wood dryer. Product from the rotary dryer is transported to the processing plant via cyclone (C-139). The exhaust stream from the cyclone is split between returning to the dryer (approx. 60%), and emitted to the atmosphere (approx. 40%) through a multiclone.
 - b. Three other cyclones (C-134, C-133, C-132) transport material through the process and are controlled by a baghouse (BH 135)
 - c. All conveyors throughout the facility, handling process materials are enclosed.

CONTINUOUS MONITORING DEVICES

6. The facility has pressure drop indicators on each cyclone and the baghouse.

COMPLIANCE

7. The facility will be inspected by Department personnel to ensure compliance with the permit conditions.

EMISSIONS

8. Proposed PSEL information:

| Pollutant | Baseline Emission Rate (tons/yr) | Netting Basis | | Plant Site Emission Limits (PSEL) | | |
|------------------|----------------------------------|--------------------|--------------------|-----------------------------------|-------------------------|-------------------------|
| | | Previous (tons/yr) | Proposed (tons/yr) | Previous PSEL (tons/yr) | Proposed PSEL (tons/yr) | PSEL Increase (tons/yr) |
| PM | NA | NA | 0 | NA | 24 | 24 |
| PM ₁₀ | NA | NA | 0 | NA | 14 | 14 |
| SO ₂ | NA | NA | 0 | NA | 39 | 39 |
| NO _x | NA | NA | 0 | NA | 39 | 39 |
| CO | NA | NA | 0 | NA | 99 | 99 |
| VOC | NA | NA | 0 | NA | 39 | 39 |

- a. The proposed PSELs for all pollutants are equal to the Generic PSEL in accordance with OAR 340-216-0064(4)(b) and the netting basis is zero in accordance with OAR 340-222-0040(2).
- b. refer to the emission detail sheets attached to the review report for specific emission calculations.
- c. The PSEL is a federally enforceable limit on the potential to emit.

SIGNIFICANT EMISSION RATE ANALYSIS

9. For each pollutant, the proposed Plant Site Emission Limit is less than the Netting Basis plus the significant emission rate, thus no further air quality analysis is required.
10. An analysis of the proposed PSEL increases over the Netting Basis is shown in the following table.

| Pollutant | SER | Requested increase over previous netting basis | Increase due to utilizing capacity that existed in the baseline period | Increase due to physical changes or changes in the method of operation |
|-----------|-----|--|--|--|
| PM | 25 | 24 | 0 | 24 |

| | | | | |
|------------------|-----|----|---|----|
| PM ₁₀ | 15 | 14 | 0 | 14 |
| SO ₂ | 40 | 39 | 0 | 39 |
| NO _x | 40 | 39 | 0 | 39 |
| CO | 100 | 99 | 0 | 99 |
| VOC | 40 | 39 | 0 | 39 |

MAJOR SOURCE APPLICABILITY

CRITERIA POLLUTANTS

11. A major source is a facility that has the potential to emit 100 or more tons per year of any criteria pollutant. This facility is not a major source of criteria pollutant emissions.

HAZARDOUS AIR POLLUTANTS

12. A major source is a facility that has the potential to emit 10 or more tons/year of any single HAP or 25 or more tons/year of combined HAPs. This source is not a major source of hazardous air pollutants.

ADDITIONAL REQUIREMENTS

NSPS APPLICABILITY

13. There are no sources at this facility for which NSPS standards have been promulgated.

NESHAPS/MACT APPLICABILITY

14. There are no sources at this facility for which NESHAPS/MACT standards have been promulgated.

RACT APPLICABILITY

15. The facility is located in the Portland AQMA, but it is not one of the listed source categories in OAR 340-232-0010, thus the RACT rules do not apply

TACT APPLICABILITY

16. The source is meeting the states TACT/Highest and Best Rules by installing baghouse and multiclone particulate controls on emission exhaust points.

PUBLIC NOTICE

17. Pursuant to OAR 340-216-0064(5)(a), issuance of Simple Air Contaminant Discharge Permits require public notice in accordance with OAR 340-209-0030(3)(b), which requires that the Department provide notice of the proposed permit action and a minimum of 30 days for interested persons to submit written comments. **The public notice was made available for public comment from February 23, 2007 until March 27, 2007, 5pm.**

dpk:xxx
Document3
3/20/2007