

Dear <name>:

The Department of Environmental Quality has determined that a potential compliance problem exists that may affect wood products facilities that operate lumber dry kilns. The purpose of this letter is to: (1) inform all wood products facilities that have lumber drying kilns that their HAP emissions may be higher than previously believed; (2) to notify you of a DEQ meeting on this topic; and (3) to suggest some next steps.

Calculating HAP emissions:

Recently, the Department has received information that indicates that emissions of **acetaldehyde** from drying lumber are higher than previously believed. As a result, some facilities which believed their HAP emissions were less than major source levels (10 tons per year or more of any single HAP or 25 tons per year or more of a combination of HAPs) have found that their HAP emissions are, or potentially could be, equal to or greater than these levels. Facilities whose HAP emissions (PTE) are less than 10/25 tons per year but are within 80 percent or more of these levels may also be affected.

Included with this letter is a memo that indicates annual lumber throughputs for various wood species that may result in HAP emissions that are at a level of concern. Information in this memo are approximations based on limited source test information. Additional testing may be required to establish more accurate thresholds for any given facility.

Implications:

Any facility that has the Potential to Emit (PTE) 10 tons per year or more of any single Hazardous Air Pollutant (HAP), or 25 tons per year or more of a combination of HAPs (referred to as 10/25 tons per year), is considered a major source of HAPs, is subject to Title III of the 1990 Clean Air Act Amendments, and must obtain a Title V permit. A major source of HAPs is also subject to any National Emissions Standards for Hazardous Air Pollutants (NESHAP) that apply to their facility. The most pertinent of these is the boiler MACT* which has a compliance date of **September 13, 2007**. (* The Department is aware that the Boiler MACT may be vacated soon, in which case this date will not be applicable.)

Next Steps:

This may be a significant compliance issue for several facilities. In order to ensure consistent application of these new HAP emission factors, DEQ will hold a meeting on this topic on Tuesday June 5 at 10:00 am at Oregon State University, Richardson Hall,

Room 313. The room has been reserved between 9 am and 2:30 pm. Campus parking information is available at http://oregonstate.edu/facilities/transit_pkg/visit_pkg.html. There is a \$5 parking pass fee. A campus map is available at [http://oregonstate.edu/cw_tools/campusmap/?L\[\]=6](http://oregonstate.edu/cw_tools/campusmap/?L[]=6). A PDF map is available at http://oregonstate.edu/facilities/transit_pkg/maps_pkg.html. At the meeting we will discuss the memo mentioned above and discuss possible next steps. Please contact your permit writer to notify him/her if you will be able to make the meeting.

In the meantime, you should review the enclosed memo closely. You may need to re-estimate your HAP PTE, including acetaldehyde, to determine if you are subject to Title III. If you are subject, the next steps are very time-critical from a compliance standpoint.

- Some facilities may need to conduct emission testing to better determine their HAP emissions. Several facilities may also wish to conduct joint testing. Most testing of wood drying emissions (VOC and HAP) has been performed at Oregon State University by Dr. Michael Milota. Dr. Milota has indicated he may be willing to conduct more testing this summer, but that all testing must be completed by the end of July, 2007. After that date it is unlikely that any further testing will be performed at OSU.
- If the facility currently has an Air Contaminant Discharge Permit, a Title V permit application must be submitted or the facility must become a Synthetic Minor by the applicable compliance date.
- The facility may take enforceable limits to limit the PTE to less than the 10/25 ton per year levels and become a Synthetic Minor source for HAPs. In this case, you will also not be subject to any applicable NESHAP. This permit action must be done prior to the compliance date of a NESHAP.
- The facility may also wish to take a two-step approach which involves immediately taking synthetic minor limits to keep HAP emissions below 10/25 tons per year to gain time to better characterize their HAP emissions and/or to comply with the Boiler MACT, and to then have the limits lifted after all actions necessary to fully comply have been completed.
- There may be other approaches as well. All of the approaches need to be orchestrated closely between the facility and its permit writer.

The Department appreciates your attention to this situation, and it is our intent to act expeditiously to help affected facilities comply. We hope you will be able to attend the meeting, and feel free to contact your permit writer for more information.