Public hearing notice about Seneca Sawmill Company – Thursday, March 19, 2020

LRAPA invites the public to attend a public hearing and comment on Seneca Sawmill Company’s proposed air quality permit, known officially as a Standard Air Contaminant Discharge Permit (Standard ACDP).

Summary:
This permit action is a proposed renewal of the Standard ACDP issued on April 7, 2015 for Seneca Sawmill Company.

How to Participate:
The interested public may attend the public hearing to learn about the permit application, ask any questions about the proposed permit, and/or provide oral or written comments on the proposed permit. Written comments may also be submitted by mail, fax, or e-mail.

Public Hearing details:
When: Thursday, March 19, 2020
- Information session begins at 5:30pm
- Hearing begins after the information session.

Where: Eugene Public Library
Bascom-Tykeson Room
100 West 10th Avenue
Eugene, OR 97401

Send written comments by mail, fax or e-mail to:
Colleen Wagstaff, Permit Coordinator
1010 Main Street
Springfield, OR 97477
Fax: 541-726-1205
E-mail: colleen@lrapa.org

Comments due: 5pm, Tuesday, March 31, 2020.

Where can I get background information?
You can review electronic versions of the draft permit and review report by visiting www.lrapa.org.

Or contact:
Jonathan Wright, Permit Writer
1010 Main Street
Springfield, OR 97477
(541) 736-1056
Email: jonathan@lrapa.org

Who is the applicant?
Seneca Sawmill Company
90201 Highway 99N
Eugene, OR 97402
www.senecasawmill.com

Where is the facility located?
90201 Highway 99 North
Eugene, OR 97402

Who might have an interest?
People who work, live, and recreate in the area.

How is air quality affected?
Seneca’s sawmill/planning mill activities, dry kilns, and fuel combustion sources release particulate matter, carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds, greenhouse gases, and hazardous air pollutants into the air.
What changes to the permit are being requested?
As part of this ACDP renewal, the facility has requested the removal of fuel oil backup capability on the 50 MMBtu per hour boiler. The 50 MMBtu per hour boiler was originally permitted to use natural gas and fuel oil backup in case of natural gas curtailment. However, the boiler has never combusted fuel oil and has no fuel oil tank. The facility has requested the 50 MMBtu per hour boiler be permitted to combust natural gas only.

LRAPA proposes to revise the baseline emission rate, netting basis and plant site emission limits (PSEL) for PM\textsubscript{10} and PM\textsubscript{2.5} applicable to the facility. The emissions of these pollutants from Seneca Sawmill are based on ODEQ emission factors in the General ACDP AQGP-010 for sawmills and related industries. ODEQ changed the emission factors in the most recent iteration of the General ACDP to reflect new information on the speciation of PM\textsubscript{10} and PM\textsubscript{2.5} from these types of sources. There is no actual change in the facility operations.

What legal requirements apply?
Oregon Revised Statutes (ORS) 468A.040 and LRAPA Title 37 give LRAPA the authority to issue permits. LRAPA Titles 12 through 51 contain all pertinent rules that govern the air quality program.

Meeting air quality standards
The facility is located inside the Eugene-Springfield Air Quality Management Area. This area has been designated an attainment area for PM\textsubscript{2.5}, NO\textsubscript{2}, SO\textsubscript{2}, Ozone (VOC), Pb and a maintenance area for CO and PM\textsubscript{10}.

What pollutants are considered in determining limits?
Criteria Pollutants: EPA and LRAPA use six key pollutants as indicators of air quality. These are known as “criteria pollutants” and are compounds that, if inhaled, may lead to health effects that generally aggravate cardiovascular and respiratory disease. If the amount of criteria pollutants emitted is greater than a regulated minimum, then emission limits are established.

For more information about criteria pollutants, go to: [https://www.epa.gov/criteria-air-pollutants](https://www.epa.gov/criteria-air-pollutants)

Federal Hazardous Air Pollutants (FHAP): FHAPs are compounds that, if inhaled, may pose a threat of adverse human health or environmental effects, including, for example, acute or chronic toxicity, cancer, birth defects, or reproductive dysfunction. The mere presence of these pollutants in the air does not necessarily mean that a health risk exists. EPA established a list of 187 compounds that are classified and regulated as FHAPs. If the amount of FHAPs released is greater than a regulated minimum level, then additional requirements may also apply.

For more information about FHAPs, go to: [https://www.epa.gov/hap](https://www.epa.gov/hap)

How are these substances measured for this facility?
The current permit requires the permittee to keep production records related to mill production and dry kiln throughput, boiler fuel usage, dry kiln operating temperatures, and hours of operation for the emergency generator. These records are used in conjunction with ODEQ and LRAPA-approved emission factors to determine facility emissions.

What happens after the meeting?
LRAPA considers and responds to all comments received and may modify the proposed permit based on these comments. However the permit writer can only modify conditions of the permit in accordance with the rules and statutes under the authority of LRAPA. Participation in the rulemaking or legislative process is the only way to change the rules or statutes. Ultimately, if a facility meets all legal requirements, LRAPA will issue the facility's air quality permit.

Accessibility information
People needing special accommodations to participate in LRAPA public hearings such as assistive listening devices or accessible formats such as large print, Braille, electronic documents, or audio tapes, should please contact the LRAPA office as soon as possible, but preferably at least 72 hours in advance.

For people requiring language interpretation services, including qualified ASL interpretation, please contact the LRAPA office as soon as possible, but preferably at least 5 business days in advance so that LRAPA can provide the most comprehensive interpretation services available.
Emission limits

Criteria Pollutants and Greenhouse gases: Table 1 below represents maximum allowable emissions of criteria pollutants for the facility. The current limit reflects the maximum emissions the facility can emit under the existing permit. The proposed limit reflects maximum emissions the facility would be able to emit under the proposed permit. Typically, a facility’s actual emissions are less than maximum limits established in a permit; however actual emissions can increase up to the permitted limit.

Table 1

<table>
<thead>
<tr>
<th>Pollutants</th>
<th>2019 Actual Emissions (tons/yr)</th>
<th>Current Limit (tons/yr)</th>
<th>Proposed Limit (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate matter (PM)</td>
<td>14</td>
<td>49</td>
<td>49</td>
</tr>
<tr>
<td>Coarse particulate matter (PM₁₀)</td>
<td>9</td>
<td>27</td>
<td>35</td>
</tr>
<tr>
<td>Fine particulate matter (PM₂.₅)</td>
<td>6</td>
<td>16</td>
<td>21</td>
</tr>
<tr>
<td>Nitrogen oxides</td>
<td>1.1</td>
<td>48</td>
<td>39</td>
</tr>
<tr>
<td>Carbon monoxide</td>
<td>1.1</td>
<td>99</td>
<td>99</td>
</tr>
<tr>
<td>Sulfur dioxide</td>
<td>0.05</td>
<td>53</td>
<td>39</td>
</tr>
<tr>
<td>Volatile organic compounds</td>
<td>77</td>
<td>99</td>
<td>99</td>
</tr>
<tr>
<td>Greenhouse gases (as CO₂ eq.)</td>
<td>3,618</td>
<td>74,000</td>
<td>74,000</td>
</tr>
</tbody>
</table>

Federal Hazardous Air Pollutants (FHAPs): Seneca Sawmill is considered an area source of FHAPs because the facility has specific FHAP limitations that restrict the emissions of any individual FHAP to no more than 9 TPY and the emissions of the aggregate of all FHAPs to no more than 24 TPY from Seneca Sawmill Company (207459) and Seneca Sustainable Energy (206470) combined. Seneca Sawmill and Seneca Sustainable Energy are considered a single source for purposes of FHAP major source thresholds. The emission totals in the table below reflect the actual and potential FHAP emissions from Seneca Sawmill.

Table 2

<table>
<thead>
<tr>
<th>Hazardous Air Pollutants</th>
<th>2019 Actual Emissions (tons/yr)</th>
<th>Limit (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acetaldehyde</td>
<td>4.94</td>
<td>9</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>0.14</td>
<td>9</td>
</tr>
<tr>
<td>Methanol</td>
<td>6.71</td>
<td>9</td>
</tr>
<tr>
<td>Total HAPs</td>
<td>11.97</td>
<td>24</td>
</tr>
</tbody>
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