



**Lane Regional Air Protection Agency
Standard Air Contaminant Discharge Permit**

Review Report

Seneca Sawmill Company
90201 Highway 99N
Eugene, Oregon 97402
Website: <https://senecasawmill.com/>

Permit No. 207459

Source Information:

Primary SIC	2421 - Sawmill/Planing Mill
Secondary SIC	--
Primary NAICS	321113 - Sawmills
Secondary NAICS	--
Source Categories	B:62. – Sawmills and/or

(LRAPA title 37, Table 1)	planing mills 25,000 or more board feet/maximum 8 hour finished product
Public Notice Category	IV

Compliance and Emissions Monitoring Requirements:

Unassigned Emissions	Y
Emission Credits	N
Compliance Schedule	N
Source Test [date(s)]	N

COMS	N
CEMS	N
Ambient monitoring	N

Reporting Requirements

Annual Report (due date)	March 1
Semi-Annual Report (due date)	September 1
GHG Report (due date)	March 31
Monthly Report (due date)	N

Quarterly Report (due date)	N
Excess Emissions Report	Y
Other Reports (due date) - LRAPA title 44 Report	February 15

Air Programs

NSPS (list subparts)	Dc, IIII
NESHAP (list subparts)	A, ZZZZ, DDDD, DDDDD
CAM	N
Regional Haze (RH)	N
Synthetic Minor (SM)	N
SM-80	N
Title V	Y
Part 68 Risk Management	N
ACDP (SIP)	N
Major FHAP Source	Y
Federal Major Source	N
NA New Source Review (NSR)	N
Prevention of Significant Deterioration (PSD)	N
Acid Rain	N
Clean Air Mercury Rule (CAMR)	N
TACT	N
>20 Megawatts	N

Permittee Identification

1. Seneca Sawmill Company. ("the facility" or "SSC") operates a sawmill at 90201 Highway 99 North, Eugene, Oregon.

General Background

2. SSC is proposing to expand the capacity of the facility. Currently the facility has a capacity of 270 million board feet of lumber. The facility is proposing to increase capacity to 540 million board feet of lumber. They are also proposing to add two (2) additional dry kilns, for a total of ten dry kilns and add two (2) additional 50 MMBtu per hour natural gas-fired boilers, for a total of three (3) 50 MMBtu per hour natural gas-fired boilers. The facility does not anticipate changing any of the control equipment related to the sawmill and planing mill activities. Currently the facility uses up to six (6) baghouses and one (1) target box with filter to control particulate matter emissions from sawmill and planing mill activities. This expansion is considered a Type 4 change under LRAPA 34-035.
3. The facility was acquired by Sierra Pacific Industries (SPI), a forest products company based in Anderson, California, in 2021. SPI owns and manages more than 2.3 million acres of timberland in California, Oregon and Washington and is one of the largest U.S. lumber manufacturers. SPI has stated they intend to retain the current name of the facility.
4. The facility is located on property that was previously contiguous with a facility last known as Tree Products Manufacturing Company, Inc. (208264). This facility consisted of a hardwood mill, kilns and a boiler. SSC purchased this facility in April 1993. LRAPA subsequently merged the two (2) facilities under the Seneca Sawmill permit identification number. The baselines for the two (2) facilities were also merged.
5. SSC is contiguous with Seneca Sustainable Energy ("SSE" – Permit No. 206470). The two facilities are considered to be separate sources, as this term is defined in LRAPA title 12, because while they are located on contiguous or adjacent properties and are owned or operated by the same person or by persons under common control, their primary business activities do not belong to the same two-digit SIC code. Also, LRAPA has previously determined that SSC is not a support facility for SSE because SSC does not provide at least 50% of the cellulosic biomass combusted by SSE on an annual basis.
6. SSC and SSE are considered one source for the purposes of determining whether the facilities are a major source of federal hazardous air pollutants (FHAP), as defined in LRAPA title 12, because they are located within a contiguous area and are under common control. As part of this permitting review, SSC has applied to become a major source of FHAP. Because SSC will be a major source of FHAP, SSE will also become a major source of FHAP.
7. Because the proposed modifications at SSC will increase potential VOC emissions above 100 TPY and the facility will become a major source of FHAP, SSC will be considered a Title V source. Upon issuance of the Standard ACDP, the facility will have up to 12 months to apply for a Title V permit.

Reasons for Permit Action and Fee Basis

8. The facility operates a process listed in LRAPA title 37, Table 1, Part B (B.62, Sawmills and/or planing mills 25,000 or more board feet/maximum 8 hour finished product) and is, therefore, required to obtain an air contaminant discharge permit. The current Standard ACDP for the facility expired on April 7, 2020. The facility submitted a renewal application on October 1, 2019. Because the facility submitted a timely renewal application at least 6 months prior to the expiration of the Standard ACDP, they are authorized to continue operating until the Standard ACDP is renewed. In the Spring of 2020, LRAPA provided public notice of a draft renewal Standard ACDP, received public comments, and the request for a public hearing. Due to Covid-19, the public hearing was cancelled, and the renewal process was paused. LRAPA intends to restart the public notice

process. The renewed Standard ACDP will be valid for up to five (5) years or until a Title V permit is issued for this facility.

9. The Standard ACDP renewal also includes a Type 4 change under LRAPA 34-035 as discussed in this review report.

Attainment Status

10. The facility is located inside the Eugene-Springfield Air Quality Management Area. The facility is located in an area that has been designated attainment/unclassified for PM_{2.5}, ozone (VOC), NO₂, SO₂, and Pb and a maintenance area for CO and PM₁₀. The facility is located within 100 kilometers of two (2) Class I air quality protection areas: Diamond Peak Wilderness and Three Sisters Wilderness area.

Permitting History

11. LRAPA has reviewed and issued the following permitting actions to this facility:

Date Approved/Valid	Permit Action Type	Description
01/01/1979 – 12/31/1984	ACDP	--
01/01/1985 – 12/31/1994	ACDP	--
01/26/1996 – 01/25/2001	SM ACDP	Added synthetic minor conditions
06/19/1998	ACDP Addendum No. 1	Added baghouse
01/26/2001 – 01/25/2006	ACDP	Renewal
01/26/2006 – 01/25/2011	ACDP	Renewal
05/12/2009	ACDP Addendum No. 1	Change the permit type and fee basis
09/04/2009	ACDP Modification	Technical permit modification to include FHAP limitations
09/26/2011 – 09/26/2016	ACDP	Renewal
12/03/2012	ACDP Addendum No. 1	Add one (1) dry kiln
01/22/2013	ACDP Addendum No. 2	Add the word "shall" in the first sentence of Condition 7.a.
04/07/2015 – 04/07/2020	ACDP	Renewal and Non-NSR/PSD complex technical modification
09/30/2020	NC-207459-A20	Approval to Construct two (2) dry kilns
10/26/2020	ACDP Addendum No. 1	Add two (2) dry kilns
01/04/2021	NC-207459-B20	Approval to Construct two (2) baghouses to control emissions from EP-05 at Stud Mill and EP-08 at Mill A
Upon Issuance	ACDP	Renewal and Type 4 change due to facility expansion and boiler installation.

Emission Unit Descriptions

12. The emission units regulated by the permit are the following:

EU ID	Emission Unit Description	PCD ID	Pollution Control Device Description
Mills	Sawmill/Planing Mill Activities	EP-01 EP-02A EP-02B EP-05 EP-06	Main Baghouse Mill A Planer Baghouse No. 1 Mill A Planer Baghouse No. 2 Stud Mill Sawdust Baghouse

EU ID	Emission Unit Description	PCD ID	Pollution Control Device Description
		EP-08 EP-11	Stud Mill Planer Shaving Baghouse Mill A Sawdust Baghouse One (1) Target Box with Filter
Kilns	10 Dry Kilns	None	None
Boiler-3	One (1) 50 MMBtu/hr Natural Gas-Fired Boiler	None	None
Boiler-4	One (1) 50 MMBtu/hr Natural Gas-Fired Boiler	None	None
Boiler-5	One (1) 50 MMBtu/hr Natural Gas-Fired Boiler	None	None
GDF	Gasoline Dispensing Facility	None	None
Categorically Insignificant Activities			
CIA-1	Diesel-Fired 150 kW Emergency Generator	None	None
CIA-2	On-Site Storage Tanks (Diesel and Gasoline)	None	None

13. Sawmill/Planing Mill Activities (Mills)

The board cutting and planing activities generate particulate matter in the form of wood dust and shavings. The particulate matter emissions from these processes are ultimately controlled by up to six (6) baghouses and one (1) target box with filter. The criteria pollutant emissions from these sources are based on emission factors from Table 13.2 of the DEQ General ACDP for sawmills, planing mills, millwork, plywood manufacturing, and/or veneer drying (AQGP-010 expiring 10/01/2027). These sources are not expected to have any significant FHAP or CAO TAC emissions.

14. 10 Dry Kilns

The facility currently uses eight (8) dry kilns to dry dimensional lumber. As part of the proposed facility expansion, the facility has requested the authority to install two (2) additional dry kilns for a total of 10 dry kilns. The steam for the dry kilns is primarily provided by SSE. The facility will use the existing and proposed boilers to generate steam on-site when SSE is not operational. The criteria, FHAP and CAO TAC emissions from these sources are based on emission factors from DEQ AQ-EF09 – DEQ HAP and VOC Emission Factors for Lumber Drying, 2021.

15. One (1) 50 MMBtu/hr Natural Gas-Fired Boiler (Boiler-3)
One (1) 50 MMBtu/hr Natural Gas-Fired Boiler (Boiler-4)
One (1) 50 MMBtu/hr Natural Gas-Fired Boiler (Boiler-5)

The facility currently uses one (1) 50 MMBtu/hr boiler (Boiler-3) installed in 2016 to dry dimensional lumber if SSE is not operational. As part of the proposed facility expansion, the facility is requesting the authority to install two (2) additional natural gas-fired boilers rated at 50 MMBtu/hr each, to be known as Boiler-4 and Boiler-5. Each boiler is capable of generating 40,000 pounds per hour of steam. These boilers will be used to dry dimensional lumber if SSE is not operational. The facility has requested the removal of fuel oil backup capability on Boiler-3. Boiler-3 was originally permitted to use natural gas as the primary fuel and fuel oil backup in case of natural gas curtailment. However, the facility never constructed any physical connections to a fuel oil source for Boiler-3. The facility has requested that Boiler-3 be permitted to combust natural gas only. The criteria pollutant emissions from these sources are based on emission factors derived from DEQ AQ-EF05 – Emission Factors Gas Fired Boilers, US EPA 40 CFR 98, Tables C-1 and C-2, and manufacturer's guarantees. The FHAP or CAO TAC emissions from these sources are based on

emission factors from "AB 2588 Combustion Emission Factors" published by California's Ventura County APCD, US EPA AP-42, Section 1.4 – Natural Gas Combustion (07/1998), and US EPA WebFIRE.

16. One (1) Gasoline Dispensing Facility

The facility has one (1) 6,000 gallon gasoline tank and one (1) 2,000 gallon gasoline tank that are used to fuel company vehicles. These tanks represent one (1) gasoline dispensing facility (GDF). The criteria, FHAP and CAO TAC emissions from this source are based on emission factors developed by LRAPA that take in to account the percentage of vehicles in Lane County equipped with Onboard Refueling Vapor Recovery.

General Emission Limitations

17. The facility is subject to the general requirements for fugitive emissions under LRAPA 48-015. The facility must not have visible emissions that leave the property of a source for a period or periods totaling more than 18 seconds in a six (6) minute period. The facility must follow, but is not limited to, the list of reasonable precautions under LRAPA 48-015(1)(a)-(g). When fugitive particulate emissions escape from an air contaminant source, LRAPA may order the facility to abate the emissions. If requested by LRAPA, the facility must develop a fugitive emission control plan.
18. The facility is subject to the visible emission limitations under LRAPA 32-010(3). For sources, other than wood-fired boilers, no person may emit or allow to be emitted any visible emissions that equal or exceed an average of 20 percent opacity for a period or periods aggregating more than three (3) minutes in any one (1) hour.
19. The non-fuel burning equipment at this source that emit particulate matter are subject to the following particulate matter emission limitations under LRAPA 32-015(2):
 - 19a. For sources installed, constructed, or modified on or after June 1, 1970 but prior to April 16, 2015 for which there are not representative compliance source test results, the particulate matter emission limit is 0.14 grains per dry standard cubic foot; and
 - 19b. For sources installed, constructed, or modified after April 16, 2015, the particulate matter emission limit is 0.10 grains per dry standard cubic foot.
20. Boiler-3, Boiler-4, and Boiler-5 are subject to particulate matter emission limitations under LRAPA 32-030(2). Boiler-3 was installed in 2016. Boiler-4 and Boiler-5 will be authorized for installation upon issuance of this permit. For sources installed, constructed, or modified after April 16, 2015, the particulate matter emission limit is 0.10 grains per dry standard cubic foot.
21. Sawmill/Planing Mill Activities and the 10 Dry Kilns are subject to the process weight rate emission limitations under LRAPA 32-045(1). No person may cause, suffer, allow, or permit the emissions of particulate matter in any one (1) hour from any process in excess of the amount shown in LRAPA 32-8010, for the process weight rate allocated to such process. Process weight is the total weight of all materials introduced into a piece of process equipment. Liquid and gaseous fuels and combustion air are not included in the total weight of all materials.
22. The facility includes on-site storage tanks (diesel and gasoline) that are included under CIA-2 that were installed in the 1980's. The diesel tanks are not subject to any specific regulations. The facility has one (1) 6,000 gallon gasoline tank and one (1) 2,000 gallon gasoline tank. These tanks represent one (1) gasoline dispensing facility (GDF) subject to the requirements under LRAPA 44-170 through 44-280. Under this regulation, the GDF is considered an existing GDF. The maximum amount of gasoline dispensed at the GDF is approximately 31,500 gallons per month. The GDF is subject to the requirements for an existing GDF whose annual throughput is less than 480,000 gallons and the monthly throughput is less than 100,000 gallons.

23. Under LRAPA 32-007, the facility must prepare an Operation and Maintenance Plan (O&M Plan) for the particulate matter control devices. If the O&M Plan is updated, the facility must submit the updated copy to LRAPA for review. If LRAPA determines the plan is deficient, LRAPA may require the facility to amend the plan. At minimum, the O&M Plan must include inspection schedules for each baghouse and cyclone. The O&M Plan must identify procedures for recording the date and time of any inspections, identification of the equipment inspected, the results of the inspection, and the actions taken if repairs or maintenance are necessary.

Typically Achievable Control Technology (TACT)

24. LRAPA 32-008(1) requires an existing unit a facility to meet TACT if the emission unit meets the following criteria: The emission unit is not already subject to emission standards for the regulated pollutant under LRAPA title 30, title 32, title 33, title 38, title 39 or title 46 at the time TACT is required; the source is required to have a permit; the emission unit has emissions of criteria pollutants equal to or greater than five (5) tons per year of particulate or ten (10) tons per year of any gaseous pollutant; and LRAPA determines that air pollution control devices and emission reduction processes in use for the emissions do not represent TACT and that further emission control is necessary to address documented nuisance conditions, address an increase in emissions, ensure that the source is in compliance with other applicable requirements, or to protect public health or welfare or the environment.
25. LRAPA 32-008(2) requires new or modified emission units to meet TACT if the emission unit meets the following criteria: The emission unit is not subject to Major NSR or Type A State NSR in LRAPA title 38, and applicable NSPS in LRAPA title 46, or any other standard applicable to only new or modified sources in LRAPA title 32, title 33, or title 39 for the regulated pollutant; the source is required to have a permit; if new, the emission unit has emissions of any criteria pollutant equal to or greater than one (1) ton per year of any criteria pollutant; if modified, the emission unit would have an increase in emissions of any criteria pollutant equal to or greater than one (1) ton per year of any criteria pollutant; and LRAPA determines that the proposed air pollution control devices and emission reduction processes do not represent TACT.
26. The Sawmill/Planing Mill Activities exhaust to six (6) baghouses and one (1) target box with filter. These control devices are considered TACT for these processes.
27. The dry kilns individually emit more than either the TACT thresholds under LRAPA 32-008(1)&(2) for VOC emissions. US EPA and LRAPA have determined that there are no control technologies currently used in practice or economically feasible for dry kilns. TACT is considered to be current operations.
28. Boiler-3, Boiler-4, and Boiler-5 will only combust natural gas and are or will be equipped with low NO_x burners that reduce NO_x and CO emissions. Boilers of this size do not usually have any additional add-on controls. These boilers are considered to meet TACT.

Plant Site Emission Limits (PSELs)

29. Provided below is a summary of the baseline emissions rate, netting basis, plant site emission limit, and potential-to-emit:

Pollutant	Original Baseline Emission Rate (TPY)	Revised Baseline Emission Rate (TPY)	Netting Basis		Plant Site Emission Limit (PSEL)		PTE (TPY)
			Previous (TPY)	Proposed (TPY)	Previous PSEL (TPY)	Proposed PSEL (TPY)	
PM	25	25	25	25	49	24	20
PM ₁₀	13	21	13	21	27	24	19

Pollutant	Original Baseline Emission Rate (TPY)	Revised Baseline Emission Rate (TPY)	Netting Basis		Plant Site Emission Limit (PSEL)		PTE (TPY)
			Previous (TPY)	Proposed (TPY)	Previous PSEL (TPY)	Proposed PSEL (TPY)	
PM _{2.5}	NA	NA	8	13	16	22	19
CO	2	2	2	2	99	99	24
NO _x	9	9	9	9	48	39	24
SO ₂	14	14	14	14	53	39	1.1
VOC	10	10	10	10	99	249	249
GHG	0	4,376	0	4,376	74,000	76,933	76,933

- 29a. The facility baseline emission rates for PM, PM₁₀, SO₂, NO_x, CO, and VOC were established in the ACDP issued on 01/26/1996. The VOC baseline emission rate was revised in the ACDPs issued on 01/26/2001 and 04/07/2015 based upon more accurate and reliable emission factors for kiln drying under the authority of LRAPA 42-0048(6)(c). The baseline emission rate for PM₁₀ is proposed to be revised under this ACDP renewal as allowed under LRAPA 42-0048(6)(c) because the DEQ emission factors for PM₁₀ from sawmill operations have been changed as reflected in the 10/10/2017 General ACDP for sawmill, planing mill, millwork, plywood manufacturing and veneer drying. A baseline emission rate is not established for PM_{2.5} in accordance with LRAPA 42-0048(3). While DEQ changed the HAP and VOC emission factors for dry kilns in 2021, there is not enough historical information available to reset the VOC baseline.
- 29b. The facility did not previously request a baseline emission rate for GHGs under the ACDP issued on 04/07/2015. For GHGs, the baseline emission rate is any consecutive 12 calendar month period during calendar years 2000 through 2010. The facility has requested the use of calendar year 2007 to establish their baseline emission rate for GHGs in this Standard ACDP.
- 29c. The netting basis for PM, SO₂, NO_x, CO, VOC, and GHGs are the same as the baseline emission rates. The netting basis for PM₁₀ has been changed to reflect the revised baseline emission rate. The original netting basis for PM_{2.5} was based on a ratio of the PM_{2.5} PSEL to the PM₁₀ PSEL (0.59) multiplied by the PM₁₀ netting basis as established in the ACDP issued on 04/07/2015. The revised netting basis for PM_{2.5} is based on the DEQ emission factors from the 10/10/2017 General ACDP for sawmill, planing mill, millwork, plywood manufacturing and veneer drying.
- 29d. The PSELs for this facility were previously established as part of a Standard ACDP for a Type 4 change issued as part of the Standard ACDP renewal on 04/07/2015. The PSELs for PM₁₀ and PM_{2.5} have been revised based upon the revision of the baselines and netting basis for these pollutants as allowed under LRAPA 42-0035(2)(a) and established at a PSEL requested by the permittee as allowed under LRAPA 42-0041(2). The PSELs for PM, NO_x and SO₂ have been lowered to the generic PSEL level because under LRAPA 42-0041, sources with a potential to emit less than the SER will receive a source specific PSEL set equal to the generic PSEL level.
- 29e. The facility requested an increase in the VOC PSEL of 150 tons per year as part of the application submitted on October 15, 2021. Because this increase is considered a Type B State NSR action under LRAPA 38-0010(2)(d)(B), there will be no increase in the netting basis for VOCs. Because this increase in VOC emissions will exceed the netting basis by the SER, the facility must perform an air quality modeling analysis under LRAPA 40-0050(1)&(2) and 40-0060. See the Air Quality Analysis section of this review report for more information.
- 29f. The PSEL for GHGs has been set at the PTE as required under LRAPA 42-0041(2) for a source that demonstrates that the requested increase over the netting basis is less than the SER.

29g. As part of the modification requested by the facility, the PSEL limits for individual FHAP and aggregate FHAP have been removed from the Standard ACDP.

Significant Emission Rate

30. The PSEL increase over the netting basis is less than the Significant Emission Rate (SER) as defined in LRAPA title 12 for all pollutants as shown below, except for VOCs. For VOCs, the increase over netting basis is due to the proposed modification.

Pollutant	Proposed PSEL (TPY)	PSEL Increase Over Netting Basis (TPY)	PSEL Increase Due to Utilizing Existing Baseline Period Capacity (TPY)	PSEL Increase Due to Modification (TPY)	SER (TPY)
PM	24	0	0	0	25
PM ₁₀	24	3	0	0	15
PM _{2.5}	22	9	0	0	10
CO	99	97	0	0	100
NO _x	39	30	0	0	40
SO ₂	39	25	0	0	40
VOC	249	239	0	239	40
GHGs	76,933	72,557	0	0	75,000

Unassigned Emissions and Emission Reduction Credits

31. The facility has unassigned emissions as shown in the table below. Unassigned emissions are equal to the netting basis minus the source's current PTE, minus any banked emission reduction credits. The facility has zero (0) tons of emission reduction credits. In accordance with LRAPA 42-0055 the maximum unassigned emissions may not be more than the SER.

Pollutant	Proposed Netting Basis (TPY)	PTE (TPY)	Unassigned Emissions (TPY)	Emission Reduction Credits (TPY)	SER (TPY)
PM	25	20	5	0	25
PM ₁₀	21	19	2	0	15
PM _{2.5}	13	19	0	0	10
CO	2	24	0	0	100
NO _x	9	24	0	0	40
SO ₂	14	1.1	13	0	40
VOC	10	249	0	0	40
GHGs	4,376	76,933	0	0	75,000

New Source Review (NSR) and Prevention of Significant Deterioration (PSD)

32. This source is located in an area that is designated attainment or unclassified for all regulated pollutants other than CO and PM₁₀. For pollutants other than CO and PM₁₀, the proposed PSELs are less than the federal major source threshold for non-listed sources of 250 TPY per regulated pollutant and are not subject to Major NSR. For CO and PM₁₀, the source is located in a maintenance area. The proposed PSELs for CO and PM₁₀ are less than the 100 TPY threshold that determines the applicability of Major NSR.

Type A and Type B State NSR

33. For regulated pollutants other than VOCs, the proposed modifications will not have emissions per regulated pollutant equal to or greater than the SER over the netting basis that would require Type A or B State NSR. For VOCs, emissions of VOCs will increase to an amount that is equal to or greater than the SER over the netting basis. Because the source is located in an area that is attainment for ozone, VOCs will be subject to Type B State NSR.
34. Within an attainment or unclassified area, a source subject to Type B State NSR must:
 - 34a. Determine compliance with the NAAQS, PSD increments, and other requirements in PSD Class II and Class III areas under LRAPA 40-0050(1)&(2), as applicable.
 - 34b. Since this facility will emit ozone precursors (VOC or NO_x) at or above the SER over the netting basis and they are located within 100 km of the Salem-Keizer ozone maintenance area, this project must also meet the requirements for demonstrating net air quality benefit under LRAPA 38-0510 and 38-0520.

Air Quality Analysis

35. Under LRAPA 40-0050(1), a facility must demonstrate compliance with the NAAQS, PSD increments, and other requirements in PSD Class II areas. LRAPA has performed a single source impact analysis as described below to demonstrate the proposed modification at the facility will not cause or contribute to a new violation of a NAAQS and PSD increment. This single source impact analysis is sufficient to show compliance if the modeled impact from emission increases equal to or greater than a SER above the netting basis due to the proposed modification being evaluated is less than any applicable Class II significant impact levels specified in LRAPA title 12, Table 1. The use of the SIL (Significant Impact Level) by itself satisfies LRAPA 40-0050(1)(b) because the background ozone concentrations in Lane County are more than the SIL below the applicable NAAQS and the formation of ozone does not result in concentration gradients in the vicinity of the source. In addition, based on the results of the single-source impact analysis, LRAPA has determined that the facility will not have a material effect on the Salem-Keizer ozone maintenance area under LRAPA 38-0520(2)(b).
36. The United States Environmental Protection Agency (U.S. EPA) established a two-tiered approach for addressing impacts of single-source emissions on ozone (O₃). The first tier involves the use of appropriate and technically credible relationships between emissions and ambient impacts. The second tier involves use of chemical transport modeling to obtain single-source impacts. In December 2016, U.S. EPA published a draft document, "Guidance on the Development of Modeled Emission Rates for Precursors (MERPs) as a Tier 1 Demonstration Tools for Ozone and PM_{2.5} under the PSD Permitting Program". The term MERP is used to describe an emission rate of a precursor that is expected to result in a change in ambient O₃ or PM_{2.5} concentration that would not cause or contribute to a violation of the NAAQS. Separate MERPs are developed for each precursor and each pollutant. Projected increases in the O₃ precursor pollutants NO_x and VOC that are below the MERP are part of a demonstration that the facility will not cause or contribute to violation of the O₃ NAAQS. Based upon the guidance, the most conservative, or lowest, MERPs from the Western US were used to determine whether the proposed emissions from the facility would cause or contribute to a violation of the NAAQS for ozone. Using the modeled concentration for the minimum MERP source in the Western US, an emission rate equivalent to a 1.0 parts per billion (ppb) impact was computed for NO_x and VOC. The facility's pollutant emissions are below these MERPs, but the contributions should be considered together to determine if the facility would cause or contribute to a violation of the NAAQS for ozone. The ratio of emissions to the MERP for each precursor were calculated and then added together. Since the sum of the ratio is not above 1.0 ppb, as shown below, the combined impact of NO_x and VOC emissions would not cause or contribute to a violation of the NAAQS for ozone.

Precursor	Western US MERP (tons)	Hypothetical Emissions (TPY)	Associated Modeled Concentration (ppb)	SSC Emissions (TPY)	Ratio SSC / MERP (ppb)	Ozone SIL (ppb)
VOC	1053	1000	0.95	249	0.237	
NO _x	184	500	2.72	24	0.131	
Total =					0.367	1.0
Calculation: SSC O ₃ contribution = (24/500 * 2.72 ppb) + (249/1000 * 0.95 ppb) = 0.367 ppb < 1.0 ppb O ₃ SIL						

Federal Hazardous Air Pollutants/Toxic Air Contaminants

37. SSC is currently a synthetic minor 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 SSC and SSE combined. As part of the proposed expansion, SSC has requested the removal of these specific FHAP limitations on SSC. Upon issuance of the renewed Standard ACDP, SSC will be considered a major source of FHAPs.
38. The Standard ACDP will retain a requirement that limits the maximum temperature in each dry kiln to no more than 200 degrees Fahrenheit (dry bulb) as monitored and recorded on a 3 hour block average. This condition is part of defining the potential emissions of FHAP and CAO TACs from the facility.
39. Under the Cleaner Air Oregon program, only existing sources that have been notified by LRAPA and new sources are required to perform risk assessments. This source has not been notified by LRAPA and is therefore, not yet required to perform a risk assessment or report annual emissions of toxic air contaminants. LRAPA required reporting of approximately 600 toxic air contaminants in 2016 and regulates approximately 260 toxic air contaminants that have Risk Based Concentrations established in rule. All FHAPs are on the list of approximately 600 toxic air contaminants. The FHAPs and toxic air contaminants listed below are based upon source testing and standard emission factors for the types of emission units at this facility. After the source is notified by LRAPA, they must update their inventory and perform a risk assessment to see if they must reduce risk from their toxic air contaminant emissions. Until then, sources will be required to report toxic air contaminant emissions triennially
40. The table below represents the potential emissions of FHAPs/TACs from SSC assuming operation at full capacity, excluding emergency generator operation. The potential emissions are calculated based on standard emission factors for the types of emission units at this facility.

CAS Number	Pollutant	PTE (TPY)	FHAP	CAO TAC
Organics				
75-07-0	Acetaldehyde	30.5	Yes	Yes
107-02-8	Acrolein	0.49	Yes	Yes
71-43-2	Benzene	2.4E-02	Yes	Yes
100-41-4	Ethyl Benzene	2.1E-02	Yes	Yes
50-00-0	Formaldehyde	0.68	Yes	Yes
110-54-3	Hexane	5.6E-02	Yes	Yes
67-56-1	Methanol	29.6	Yes	Yes
91-20-3	Naphthalene	1.9E-04	Yes	Yes
NA	POM (inc. PAHs)	2.6E-04	Yes	Yes

CAS Number	Pollutant	PTE (TPY)	FHAP	CAO TAC
123-38-6	Propionaldehyde	0.32	Yes	Yes
115-07-1	Propylene	0.34	No	Yes
108-88-3	Toluene	0.13	Yes	Yes
540-84-1	2,2,4-Trimethylpentane	2.2E-02	Yes	Yes
1330-20-7	Xylenes	7.2E-02	Yes	Yes
Inorganic Gases				
7664-41-7	Ammonia	2.05	No	Yes
Metals				
7440-38-2	Arsenic	1.3E-04	Yes	Yes
7440-41-7	Beryllium	7.7E-06	Yes	Yes
7440-43-9	Cadmium	7.0E-04	Yes	Yes
7440-47-3	Chromium, Hexavalent	9.0E-04	Yes	Yes
7439-96-5	Manganese	2.4E-04	Yes	Yes
7439-97-6	Mercury	1.7E-04	Yes	Yes
7440-02-0	Nickel	1.3E-03	Yes	Yes
7782-49-2	Selenium	1.5E-05	Yes	Yes
Total (TPY) =		64.3	61.9	64.3

National Emission Standards for Hazardous Air Pollutants (NESHAPs)

40 CFR Part 63 subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products

41. Upon issuance of the Standard ACDP, SSC will become a major source of FHAPs. As such, the eight (8) existing and two (2) proposed dry kilns will become subject to the requirements under 40 CFR Part 63 subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products. Although this facility does not manufacture plywood or composite wood products, the definition of “plywood and composite wood products manufacturing facility” includes lumber kilns located at any facility. Because the facility is an affected source that was constructed prior to January 9, 2003, and has not been reconstructed as defined in 40 CFR 63.2 since that time, the affected source is considered to be existing under this regulation. Under 40 CFR 63.2233(c), the facility must be in compliance with this regulation upon initial startup of the affected source as a major source (upon permit issuance).

40 CFR 63 subpart DDDD Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
63.2230	Purpose	Yes	None.	NA
63.2231	Applicability	Yes	None.	NA
63.2232	Affected sources	Yes	None.	NA
63.2233	Compliance dates	Yes	None.	NA
63.2240	Compliance options and operating requirements	No	None.	NA
63.2241	Work practice requirements	No	None.	NA
63.2250	General requirements	No	None.	NA
63.2251	Requirements for the routine control device maintenance exemption	No	None.	NA

40 CFR 63 subpart DDDD Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
63.2252	Requirements for process units that have no control or work practice requirements	Yes	Lumber kilns are only subject to initial notification under 40 CFR 63.9(b). No further requirements apply. The ACDP application fulfilled the initial notification requirement as allowed under 40 CFR 63.9(b)(2).	32, 33
63.2260	Initial compliance with the compliance options, operating requirements, and work practice requirements	No	None.	NA
63.2261	Performance tests or other initial compliance demonstrations	No	None.	NA
63.2262	Conducting performance tests and establishing operating requirements	No	None.	NA
63.2263	Initial compliance for a dry rotary dryer	No	None.	NA
63.2264	Initial compliance for a hardwood veneer dryer	No	None.	NA
63.2265	Initial compliance for a softwood veneer dryer	No	None.	NA
63.2266	Initial compliance for a veneer dryer	No	None.	NA
63.2267	Initial compliance for a reconstituted wood product press or board cooler	No	None.	NA
63.2268	Initial compliance for a wet control device	No	None.	NA
63.2269	Monitoring installation, operation, and maintenance requirements	No	None.	NA
63.2270	Continuous compliance monitoring and data collection	No	None.	NA
63.2271	Continuous compliance with the compliance options, operating requirements, and work practice requirements	No	None.	NA
63.2280	Notifications	No	None.	NA
63.2281	Reports	No	None.	NA
63.2282	Records	No	None.	NA
63.2283	Form and retention of records	No	None.	NA
63.2290	General Provision applicability	No	None.	NA
63.2291	Implementation and enforcement	No	None.	NA
63.2292	Definitions	Yes	None.	NA

40 CFR Part 63 subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

42. Upon issuance of the Standard ACDP, the facility will become a major source of FHAPs. As such, Boiler-3, Boiler-4 and Boiler-5 will become subject to the requirements under 40 CFR 63 subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. Boiler-3 is considered an existing boiler under 40 CFR 63.7490(b) because although the boiler was installed after June 4, 2010, the facility was an area source at the time of installation. Boiler-4 and Boiler-5 will be considered new boilers. Under 40 CFR 63.7495(c)(2), Boiler-3 must be in compliance with this regulation within 3 years after the facility becomes a major source of FHAP. Boiler-4 and Boiler-5 must be in compliance with this regulation upon startup.
43. The 40 CFR 63 subpart DDDDD requirements that are applicable to Boiler-3, Boiler-4 and Boiler-5 at the facility are identified in the following table:

40 CFR 63 subpart DDDDD Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
63.7480	Purpose	Yes	None.	NA
63.7485	Applicability	Yes	None.	NA
63.7490	Affected source	Yes	Boiler-3 is existing. Boiler-4 and Boiler-5 are new.	NA
63.7491	Exceptions to affected source	No	None.	NA
63.7495	Compliance dates	Yes	Boiler-3 has three years to comply. Boiler-4 and Boiler-5 must comply upon startup.	21
63.7499	Subcategories	Yes	Boilers are designed to burn gas 1 fuels.	NA
63.7500	Emission limitations, work practice standards, and operating limits	Yes	Conduct a tune-up annually or every 5 years, one-time energy assessment	22
63.7505	General requirements	Yes	None.	23
63.7510	Initial compliance requirements	No	None.	24
63.7515	Subsequent performance tests, fuel analyses, or tune-ups	Yes	Conduct a tune-up annually or once every 5 years	25
63.7520	Stack tests and procedures	No	None.	NA
63.7521	Fuel analyses, fuel specifications, and procedures	No	None.	NA
63.7522	Emissions averaging	No	None.	NA
63.7525	Monitoring, installation, operation, and maintenance requirements	No	None.	NA
63.7530	Initial compliance with emission limitations, fuel specifications and work practice standards	Yes	None.	26
63.7533	Efficiency credits	No	None.	NA
63.7535	Minimum monitoring data	No	None.	NA

40 CFR 63 subpart DDDDD Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
63.7540	Continuous compliance with emission limitations, fuel specifications and work practice standards	Yes	None.	27
63.7541	Continuous compliance with emission averaging	No	None.	NA
63.7545	Notifications	Yes	None.	28
63.7550	Reports	Yes	None.	29
63.7555	Records	Yes	None.	30
63.7560	Form and retention of records	Yes	None.	31
63.7565	General Provision applicability	Yes	None.	NA
63.7570	Implementation and enforcement	Yes	None.	NA
63.7575	Definitions	Yes	None.	NA

National Emission Standards of Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities – 40 CFR 63 Subpart CCCCCC

44. The facility is permitted currently as an area source of FHAPs. The facility has one (1) gasoline dispensing facility subject to the area source requirements under 40 CFR Part 63 subpart CCCCCC – National Emission Standards of Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities. Upon issuance of the Standard ACDP, the facility will become a major source of FHAPs and 40 CFR 63 subpart CCCCCC will no longer apply. There is no equivalent major source NESHAP for gasoline dispensing facilities.

40 CFR 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

45. The facility is permitted currently as an area source of FHAPs. Upon issuance of the Standard ACDP, the facility will become a major source of FHAPs. The diesel-fired 150 kW emergency generator CIA-1 was installed on or after June 12, 2006 and is considered a new stationary RICE subject to the requirements under 40 CFR Part 63 subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. Under 40 CFR 63.6590(c)(6), a new or reconstructed emergency or limited use stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of FHAP emissions must meet the requirements of 40 CFR 63 subpart ZZZZ by meeting the requirements of 40 CFR 60 subpart IIII. No further requirements apply for these engines under 40 CFR 63 subpart ZZZZ
46. The 40 CFR Part 63 subpart ZZZZ requirements that are applicable to CIA-1 are identified in the following table:

40 CFR Part 63, subpart ZZZZ Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
63.6580	Purpose	Yes	None.	NA
63.6585	Applicability	Yes	None.	NA

40 CFR Part 63, subpart ZZZZ Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
63.6590	Applicability	Yes	Subject to limited requirements.	34
63.6600	Emission limitations	No	None.	NA
63.6601	Emission limitations	No	None.	NA
63.6602	Emission limitations	No	None.	NA
63.6603	Emission limitations	No	None.	NA
63.6604	Fuel requirements	No	None.	NA
63.6605	General requirements	No	None.	NA
63.6610	Initial compliance	No	None.	NA
63.6611	Initial performance test	No	None.	NA
63.6612	Initial performance test	No	None.	NA
63.6615	Subsequent performance tests	No	None.	NA
63.6620	Performance test procedures	No	None.	NA
63.6625	Monitoring and maintenance requirements	No	None.	NA
63.6630	Initial compliance	No	None.	NA
63.6635	Continuous compliance	No	None.	NA
63.6640	Continuous compliance	No	None.	NA
63.6645	Notifications	No	None.	NA
63.6650	Reports	No	None.	NA
63.6655	Records	No	None.	NA
63.6660	Record retention	No	None.	NA
63.6665	General provisions	No	None.	NA
63.6670	Implementation and enforcement	No	None.	NA
63.6675	Definitions	No	None.	NA

New Source Performance Standards (NSPSs)

40 CFR 60 subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

47. Any steam generating unit as this term is defined under 40 CFR 60.41c that commences construction, modification, or reconstruction after June 9, 1989, and that has a maximum design heat input capacity of greater than or equal to 2.9 MW (10 MMBtu per hour) and no more than 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)) is subject to regulation under 40 CFR 60 subpart Dc. Boiler B-3, Boiler-4, and Boiler-5 were or will be constructed after the applicability date and have a maximum heat input capacity of 50 MMBtu per hour each. Each boiler is or will be subject to this regulation.

48. The 40 CFR 60 subpart Dc requirements that are applicable to Boiler-3, Boiler-4 and Boiler-5 are identified in the following table:

40 CFR 60 subpart Db Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
60.40c	Applicability and delegation of authority	Yes	Each boiler has a maximum heat input capacity between 10 and 100 MMBtu per hour.	NA
60.41c	Definitions	Yes	Each boiler meets the definition of a <i>steam generating unit</i> .	NA
60.42c	Standards for sulfur dioxide (SO ₂)	No	None.	NA
60.43c	Standard for particulate matter (PM)	No	None.	NA
60.44c	Compliance and performance test methods and procedures for sulfur dioxide	No	None.	NA
60.45c	Compliance and performance test methods and procedures for particulate matter	No	None.	NA
60.46c	Emission monitoring for sulfur dioxide	No	None.	NA
60.47c	Emission monitoring for particulate matter	No	None.	NA
60.48c	Reporting and recordkeeping requirements	Yes	Maintain records of the monthly usage of natural gas by each boiler.	20

40 CFR 60 subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

49. For facilities, 40 CFR 60 subpart IIII applies to any stationary CI ICE that commence construction after July 11, 2005, where the stationary CI ICE are manufactured after April 1, 2006, and are not fire pump engines. Diesel-fired 150 kW emergency generator CIA-1 meets the definition of an *emergency stationary internal combustion engine* under 40 CFR 60.4219 and was installed in 2016. Facilities that have a 2007 model year and later emergency stationary CI ICE with a displacement of less than 30 liters per cylinder must comply with the emission standards for new nonroad CI engines as listed in 40 CFR 89.112 and 40 CFR 89.113.
50. Facilities with a stationary CI internal combustion engine with a displacement of less than 30 liters per cylinder must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel. Currently, the sulfur content of nonroad diesel fuel may not exceed 15 ppm (0.0015 percent by weight).
51. Emergency stationary ICE may be operated for maintenance checks and readiness testing for a maximum of 100 hours per calendar year. The federal requirements also allow an emergency stationary ICE to operate for up to 50 hours per year in non-emergency situations, for which the 50 hours are counted as part of the 100 hours per calendar year for maintenance checks and readiness testing. However, the description of an emergency generator in the definition of

“Categorically Insignificant Activity” LRAPA title 12, does not allow an emergency generator to be used in this manner in the state of Oregon. The portions of the rule that conflict with the definition in LRAPA title 12 have not been included in the draft permit. There is no time limit on the use of emergency stationary ICE in emergency situations.

52. On May 1, 2015, the D.C. Courts of Appeals vacated the exemption provisions for emergency demand response in 40 CFR 63 subpart ZZZZ, 40 CFR 60 subpart IIII, and 40 CFR 60 subpart JJJJ (*Delaware Dept. of Nat. Resources and Env'tl. Control v. EPA*). The vacated provisions have been removed from the draft permit even though US EPA has not revised the applicable regulations at this time.
53. The 40 CFR 60 subpart IIII requirements that are applicable to the diesel-fired emergency generator CIA-1 are identified in the following table:

40 CFR 60 subpart IIII Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
60.4200	Applicability	Yes	None.	NA
60.4201	Emission standards	No	None.	NA
60.4202	Applicability	Yes	2007 model year and later emergency stationary CI ICE with a max engine power less than or equal to 3,000 HP and a displacement of less than 10 liters per cylinder are subject to the emission standards in 40 CFR 89.112 and 40 CFR 89.113.	35
60.4203	Emission standards	No	None.	NA
60.4204	Emission standards	No	None.	NA
60.4205	Emission standards	Yes	Owners and operators of 2007 model year and later emergency stationary CI ICE with a displacement of less than 30 liters per cylinder must comply with the emission standards in 40 CFR 89.112 and 40 CFR 89.113.	35
60.4206	Emission standards	Yes	The emission standards are applicable for the life of the engine.	37
60.4207	Fuel requirements	Yes	Must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel.	38
60.4208	Requirements	No	None.	NA
60.4209	Monitoring requirements	Yes	Installation of a non-resettable hour meter.	39
60.4210	Compliance requirements	No	None.	NA
60.4211	Compliance requirements	Yes	None.	40
60.4212	Testing requirements	No	None.	NA
60.4213	Testing Methods	No	None.	NA
60.4214	Notification, reporting, and recordkeeping requirements	Yes	None.	41

40 CFR 60 subpart III Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
60.4215	Special requirements.	No	None.	NA
60.4216	Special requirements	No	None.	NA
60.4217	Special requirements	No	None.	NA
60.4218	General provisions	Yes	None.	NA
60.4219	Definitions	Yes	None.	NA

Toxic Release Inventory

54. The Toxics Release Inventory (TRI) is federal program that tracks the management of certain toxic chemicals that may pose a threat to human health and the environment, over which LRAPA has no regulatory authority. It is a resource for learning about toxic chemical releases and pollution prevention activities reported by certain industrial facilities. Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) created the TRI Program. In general, chemicals covered by the TRI Program are those that cause:

- Cancer or other chronic human health effects;
- Significant adverse acute human health effects; or
- Significant adverse environmental effects.

There are currently over 650 chemicals covered by the TRI Program. Facilities that manufacture, process or otherwise use these chemicals in amounts above established levels must submit annual TRI reports on each chemical. NOTE: The TRI Program is a federal program over which LRAPA has no regulatory authority. LRAPA does not guarantee the accuracy of any information copied from EPA's TRI website.

In order to report emissions to the TRI program, a facility must operate under a reportable NAICS code, meet a minimum employee threshold, and manufacture, process, or otherwise use chemicals in excess of the applicable reporting threshold for the chemical. This facility has not reported any emissions to the TRI program because they do not manufacture, process, or otherwise use chemicals in excess of the applicable reporting thresholds.

Compliance History

55. This facility is regularly inspected by LRAPA and occasionally by other regulatory agencies. The following table indicates the inspection history of this facility since 1979:

Type of Inspection	Date	Results
LRAPA - Full Compliance Evaluation	09/05/1979	In compliance
LRAPA - Full Compliance Evaluation	06/06/1980	In compliance
LRAPA - Full Compliance Evaluation	11/25/1981	In compliance
LRAPA - Full Compliance Evaluation	11/12/1982	In compliance
LRAPA - Full Compliance Evaluation	02/01/1984	In compliance
LRAPA - Full Compliance Evaluation	11/1984	In compliance
LRAPA - Full Compliance Evaluation	02/03/1986	In compliance
LRAPA - Full Compliance Evaluation	10/21/1986	In compliance
LRAPA - Full Compliance Evaluation	01/06/1988	In compliance
LRAPA - Full Compliance Evaluation	12/12/1988	In compliance
LRAPA - Full Compliance Evaluation	12/19/1989	In compliance
LRAPA - Full Compliance Evaluation	12/10/1990	In compliance

Type of Inspection	Date	Results
LRAPA - Full Compliance Evaluation	04/27/1992	In compliance
LRAPA - Full Compliance Evaluation	04/13/1993	In compliance
LRAPA - Full Compliance Evaluation	07/26/1994	In compliance
LRAPA - Full Compliance Evaluation	02/21/1997	In compliance
LRAPA - Full Compliance Evaluation	02/25/1998	In compliance
LRAPA - Full Compliance Evaluation	01/28/1999	Not in compliance – NON 1709
LRAPA - Full Compliance Evaluation	02/11/2000	In compliance
LRAPA - Full Compliance Evaluation	02/06/2001	In compliance
LRAPA - Full Compliance Evaluation	09/09/2003	In compliance
LRAPA - Full Compliance Evaluation	02/08/2006	In compliance
LRAPA - Full Compliance Evaluation	08/23/2007	In compliance
LRAPA - Full Compliance Evaluation	04/19/2011	Not in compliance – NON 3287
LRAPA - Full Compliance Evaluation	04/18/2014	In compliance
LRAPA - Full Compliance Evaluation	07/18/2019	In compliance

56. LRAPA has issued the following violation notices and/or taken the following enforcement actions against this facility:
- 56a. On October 17, 1994, LRAPA issued Stipulated Final Order (SFO) No. 94-65 to the facility ordering them to apply for a construction approval and permit modification. The facility fulfilled the order and the SFO was closed.
 - 56b. On January 30, 1996, LRAPA issued NON No. 1184 to the facility for installing process and pollution control equipment without receiving an authority to construct. Facility was required to not operate the equipment until a permit modification was issued and the violation was closed.
 - 56c. On February 5, 1999, LRAPA issued NON No. 1709 to the facility for exceeding the dry kiln throughput limits. Facility was required to calculate VOC emissions for wood processed through the dry kilns for a rolling 12-month period to include August and September of 1997 and submit the findings to LRAPA. The amount of VOCs emitted was not enough to trigger Title V and the violation was closed.
 - 56d. On February 17, 2006, LRAPA issued NON No. 2855 to the facility for failure to submit report of distillate fuel oil used for the first quarter of 2004. The report was required to have been received by LRAPA on April 30, 2004. Facility submitted report and violation was closed.
 - 56e. On April 19, 2011, LRAPA issued NON No. 3287 to the facility for failure to submit the renewal application in a timely manner. The facility submitted the renewal application and the violation was closed.
 - 56f. On November 15, 2012, LRAPA and the facility entered into Stipulation and Final Order (SFO) No. 12-3404 to address permit violations related to the facility drying in excess of the rate identified in Condition 14.f. of the permit in effect at the time (90,886 MBF of lumber) during the 12-month rolling period ending April 30, 2012 and each subsequent 12-month rolling period. As part of the resolution stipulated in the SFO, the permit was revised to clarify the FHAP limits and the facility was required to pay a civil penalty assessed in the amount of \$2,400. The permit was revised by way of Addendum 1 (Non-PSD/NSR Simple Technical Modification) on December 3, 2012. The facility paid the civil penalty in the amount of \$2,400 and the file was closed.

Performance Test Results

57. The facility is not required to conduct performance testing at this time as the basis for the facility's emission estimates, industry-specific emission factors, appears to be reasonable. LRAPA is not aware of any performance testing conducted at this facility.

Recordkeeping Requirements

58. The facility is required to keep and maintain a record of the following information for a period of five (5) years:

Activity	Units	Minimum Recording Frequency
PSEL Recordkeeping		
Stud mill production	MBF	Monthly
Mill A lumber production	MBF	Monthly
Dry Kiln Throughput by species	MBF	Monthly
Chips shipped from plant site, including to SSE	BDT	Monthly
Sawdust shipped from plant site, including to SSE	BDT	Monthly
Shavings shipped from plant site, including to SSE	BDT	Monthly
Natural gas combusted	MMSCF	Monthly
Dry kiln temperature (degrees F)	Degrees F	Twice per charge
Fugitive emission survey logs	NA	Monthly
Operation and Maintenance Plan	NA	Maintain the current version on-site
NSPS Dc Recordkeeping		
Initial notification for NSPS Dc	NA	One time
Natural gas combusted	MMSCF	Monthly
NESHAP DDDDD (5D) Recordkeeping		
Initial notification for NESHAP 5D	NA	One time
Notice of compliance status	NA	One time
Energy assessment	NA	One time
5 year tune-up	NA	Every 5 years
NESHAP DDDD (4D) Recordkeeping		
Initial notification for NESHAP 5D	NA	One time
NSPS IIII Recordkeeping		
The date and time of operation in hours of CIA-1	Date, Hours of operation	Each occurrence
Reason for operation of CIA-1	NA	Each occurrence
The total hours that CIA-1 operates for emergency reasons in a calendar year	Hours	Monthly
The total hours that CIA-1 operates for non-emergency reasons in a calendar year	Hours	Monthly
LRAPA Title 44 Recordkeeping		
Initial notification for Title 44	NA	One time
The monthly gasoline throughput of the GDF	1000 Gallons	Monthly
The annual gasoline throughput of the GDF in any 12 consecutive months	1000 Gallons	Monthly
Documentation of the distance the submerged fill pipe extends from the bottom of each storage tank	NA	Documentation
Records of the occurrence and duration of each malfunction of operation	NA	Each occurrence
Records of actions taken during periods of malfunction to minimize emissions	NA	Each occurrence

Reporting Requirements

59. The facility must submit to LRAPA the following reports by the dates indicated in the table below:

Report	Reporting Period	Due Date
Title 44 Report, if monthly gasoline throughput is greater than or equal to 10,000 gallons in a calendar year.	Annual	February 15
The upset log information required by Condition G.13 of the permit, if required by G.13.	Annual	March 1
Annual emissions as calculated according to Conditions 4 and 6 of the permit, including the supporting process parameter and emission factor information	Annual	March 1
Reports required under 40 CFR 63 subpart 5D	Every 5 Years	March 1
GHG report, if required by Condition 6 of the permit	Annual	March 31

60. The facility is required to submit an annual report to LRAPA by March 1st of each year this permit is in effect. The annual compliance report must include emissions calculations, recordkeeping requirements, and any entries in the upset log as required by permit Condition G15

Public Notice

61. LRAPA held an informational meeting on July 11, 2022. The proposed permit was on public notice from July 12, 2022 to August 22, 2022. Written comments were submitted during the 40-day comment period. LRAPA held a public hearing on August 10, 2022.

After the comment period and hearing, LRAPA responded to comments received and is taking final action to issue the permit within the 45 days of the close of the public comment and hearing period.

Public Hearing Summary

On Wednesday, August 10, 2022, beginning at approximately 5:27pm, a virtual public hearing was held on for the modification and renewal of the Standard Air Contaminant Discharge Permit for Seneca Sawmill Company (Source Number 207459) located at 90201 Highway 99N, Eugene, Oregon, 97402. Thirteen members of the public and the facility were in attendance remotely based upon a count of Zoom logins. Four members of the public provided oral comments during the public hearing.

The LRAPA representatives participating in the public hearing were Steven Dietrich, Director, Travis Knudsen, Public Affairs Manager, Jonathan Wright, Permit Writer, Cassandra Jackson, Compliance Inspector, and Katie Eagleson, Public Hearing Officer.

Prior to the public hearing, Travis Knudsen conducted an informational presentation that discussed the location and purpose of the facility, the types of emission units at the facility, a summary of the emissions from the facility, and a summary of the proposed modifications to the permit. Following the presentation, Jonathan Wright, Cassandra Jackson, and Steve Dietrich answered informal questions asked by meeting participants. The public hearing was opened by Katie Eagleson, who provided a summary of the purpose and format of the hearing. The rest of the public hearing consisted of a forum for public comments.

Public Comments Summary and LRAPA Responses

[All public comments that were received for this project are a public record and are retained with the public permit review files. For purposes of this summary document, the public comments may have been edited to reduce length or consolidated with similar comments. Public comments that are not related to the review report or draft permit, such as those comments that are statements of fact or express an opinion, are not presented in this document, and do not require a response from LRAPA. In addition, LRAPA has included a response to public comments for Seneca Sawmill Company that were previously received during the public comment period for Seneca Sustainable Energy and not previously addressed in the response to comments for Seneca Sustainable Energy.]

Comment 1: By allowing Seneca Sawmill to significantly increase PM_{2.5} emissions, LRAPA overlooks the distinct health impacts of fine particulate on the West Eugene community. Fine particulate matter pollution has long been an environmental justice concern for the West Eugene community, and the Sawmill's proposed increase of PM_{2.5} emissions will directly and adversely affect the residents of West Eugene. This community has dealt with years of cumulative pollution from dirty industries operating adjacent to their homes, schools, and recreational areas. PM_{2.5}, in particular, is a long-standing and well-documented community concern. Increasing all particulate matter emissions poses a significant risk to human health; however, increasing smaller particulates (under 10 micrometers) poses the greatest threat. PM_{2.5} can travel deep into human respiratory tracts and even enter the bloodstream to impact the nervous system and the lungs. High exposure leads to several long- and short-term health conditions including but not limited to asthma, premature death for those with heart and lung disease, nonfatal heart attacks, irregular heartbeat, decreased lung function, increased irritation of airways, increased coughing, difficulty breathing, and reproductive issues. West Eugene residents have dealt with decades of toxic industry; as a result, community members must live with many harmful, chronic health conditions. Top among these conditions is an increased rate of asthma among community members. According to the Health Disparities data from the EPA's EJScreen Mapping Tool (version 2.0), areas surrounding the Seneca Sawmill are between the 60th to 95th percentile for asthma. Additionally, the Bethel neighborhood, which sits downwind from the Seneca Sawmill, is in the 95-100th percentile for asthma.

Response 1: The Clean Air Act requires US EPA to set National Ambient Air Quality Standards (NAAQS) for six criteria air pollutants, including PM_{2.5}. These standards are required to be set at levels to protect human health and the environment. Currently, the primary NAAQS standards for PM_{2.5} are a 24-hour standard of 35 µg/m³ (98th percentile, averaged over 3 years) and an annual standard of 12 µg/m³ (annual mean, averaged over 3 years). LRAPA operates several air quality monitors in Lane County, including an air quality monitor that measures PM_{2.5} in the Highway 99 corridor on the east side of the West Eugene neighborhoods. Based on data from 2012 through 2021, excluding the impacts of wildfires, the PM_{2.5} concentrations at this monitor have not exceeded either the 24-hour or the annual NAAQS standard. In addition, the PM_{2.5} concentrations at the Highway 99 monitor are very similar to the PM_{2.5} concentrations measured at the PM_{2.5} monitor located in Amazon Park in the South Eugene neighborhoods. The increase in the PM_{2.5} PSEL of 6 TPY is unlikely to cause an exceedance of the 24-hour or annual PM_{2.5} NAAQS standards at either air quality monitor. Based on air quality monitoring, the air quality in the City of Eugene is protective of human health and the environment.

LRAPA does not consider the increase in the PSEL for PM_{2.5} from 16 tons per year (TPY) to 22 TPY to be significant. Under current LRAPA regulations, a significant increase in PM_{2.5} emissions occurs when a proposed increase above the netting basis is equal to or greater than the Significant Emission Rate (SER). The SER is 10 TPY for PM_{2.5} emissions. The proposed netting basis for PM_{2.5} emissions is 13 TPY. Since the Plant Site Emission Limit for PM_{2.5} emissions is proposed to be 22 TPY, no significant increase, as defined by the applicable regulations, is occurring as part of

the proposed modification. Please note that the potential PM_{2.5} emissions from the facility are calculated to be 19 TPY. However, under LRAPA's current regulations, a facility may request a PSEL that is as high as 1 TPY less than the applicable SER over the netting basis without triggering additional review requirements.

LRAPA does not dispute the commenter's characterization of effects of PM_{2.5} on the human body or that West Eugene residents may have been impacted by emissions from local industry. However, a review of EPA's EJScreen Mapping Tool indicates that most of the core of Eugene and Springfield are in the 95-100th percentile for asthma. In addition, almost all of Lane County is in at least the 80-90th percentile for asthma. Considering the widespread nature of these high asthma rates in Lane County, industrial sources of PM_{2.5} emissions are unlikely to be a significant cause or contributor based on the available data.

Comment 2: Additionally, LRAPA overlooked the health implications of a significant increase in VOC in the surrounding West Eugene community. The total VOC increase in this permit is 2.5 times the previous emissions, increasing from 99 tons per year (tpy) to 249 tpy. While this may be within the legal limit, Beyond Toxics is still concerned about the overall health implications of adding substantially more hazardous emissions to an already overburdened community's airshed. In its public informational session, LRAPA highlighted that the three top VOC emissions were acetaldehyde, methanol, and formaldehyde. These pollutants have varying levels of severe health impacts; for example, repeated exposure to methanol is a developmental toxicity risk and could also be a reproductive toxicity risk. Methanol may cause birth defects in the central nervous system of humans, and repeated exposure may also lead to chronic conditions such as conjunctivitis, recurrent headaches, insomnia, stomach disturbances, and visual failure. Formaldehyde can irritate the skin, eyes, nose, and throat and is a carcinogen. Increased levels of PM_{2.5} and VOC will only worsen and contribute to asthma and other existing health issues the community downwind of Seneca Sawmill presently faces. LRAPA's decision to issue the Seneca Sawmill permit as proposed will also substantially increase air toxics experienced by children, the elderly, and people with pre-existing health conditions in the form of missed days of work or school due to asthma attacks, increased medical costs, loss of opportunities to participate in outdoor recreational activities, and more.

Response 2: The primary tool that LRAPA has for evaluating a facility's health impacts resulting from toxic air contaminants is known as Cleaner Air Oregon (CAO). The risk of health impacts from a pollutant is based on toxicity of the pollutant and the exposure time to the pollutant. Under CAO, methanol has a very high risk based concentration (RBC), indicating that this chemical is not very toxic. Acetaldehyde has a medium RBC and formaldehyde has a low RBC, indicating that these chemicals will drive the health risk at this facility. In addition, CAO allows a facility to determine health risk based on each target organ affected by the chemicals rather than as a cumulative risk. Methanol is considered to have primarily nervous system and developmental effects. Acetaldehyde is considered to have primarily eye and respiratory system effects. Formaldehyde is considered to have primarily respiratory system effects. Qualitatively, the health risk from the facility for evaluation under CAO would be based on the risk from methanol emissions or the combined risk from acetaldehyde and formaldehyde emissions, whichever is higher. As part of LRAPA's review of the Seneca Sawmill permit application, LRAPA did conduct some preliminary air quality modeling using AERMOD to assess the impact of the increased emissions from the facility's expansion on the surrounding community based on the air quality modeling conducted for the CAO risk assessment for Seneca Sustainable Energy. The results of this preliminary air quality modeling indicated that the risk from the facility would be above the Community Engagement Risk Action Level but below the Toxics Best Available Control Technology Risk Action Level. Based on this discussion, LRAPA does not believe there is justification to further delay the renewal of this facility's air quality permit while waiting for the completion of a CAO risk assessment.

Prior to the modification, this facility was in Group 3 of LRAPA's CAO prioritization list. The prioritization process ranked existing facilities based on 2016 reported actual toxic air contaminant emissions and demographic data within 1 km of the facility, such as, minority population, low income, and children <5 years. As part of the prioritization process, LRAPA also considered qualitative information about each facility, including sufficiency of information about emissions, a history of compliance issues or citizen complaints, and the efficient allocation of LRAPA permit writing resources. The placement of a facility in the prioritization grouping determines the order in which facilities will be called into the CAO process. LRAPA is currently working on facilities that are in Group 1 and Group 2. Based on the proposed modifications, this facility would move higher within Group 3. Currently, there are a number of other Groups 1 and 2 facilities whose existing emissions' impact on vulnerable or marginalized communities is not currently known, and for which LRAPA has resources planned to be allocated based on existing and future workloads. In general, LRAPA does not believe it would be fair to these communities to have other existing facilities jump ahead in the line just because the facility has a higher profile to the general public.

However, LRAPA does believe there are some unique circumstances for this situation that need to be considered. LRAPA believes that this facility's emissions profile is very well defined such that the full CAO risk assessment could be completed relatively quickly without a significant impact on LRAPA's permitting resources or adversely impacting the timelines of other facilities on the CAO prioritization list. In addition, the facility has submitted a request to initiate the CAO call-in process as part of their public comments. While neither Oregon DEQ nor LRAPA have allowed an existing facility to opt-in to the CAO program before, LRAPA believes this request serves a significant public interest. As such, LRAPA will be providing Seneca Sawmill Company a notice in accordance with OAR 340-245-0050 that they are being called-in to the CAO program in early 2023. It is important to remember that CAO is a program that regulates emissions of toxic air contaminants based on local risks to health. CAO does not prohibit the emissions of toxic air contaminants. The CAO process may or may not result in additional limitations being placed on the operation of the facility, depending on the results of the CAO risk assessment.

Comment 3: If LRAPA approves the permits as proposed, without modifying the pollution emission levels, LRAPA must explain to the public how environmental justice considerations informed the agency's permitting decision. While LRAPA is not technically a listed "state natural resource agency" under ORS 182.545 and is not technically subject to the obligations of that statute, the agency should hold itself to a similar standard as the DEQ and meaningfully consider the effects of an action on environmental justice issues. We urge the agency to wholly embrace both the letter and spirit of ORS 182.545's environmental justice obligations. ORS 182.545 directs natural resource agencies, a description that fits LRAPA's role in Lane County, to consider the effects of its decisions on environmental justice issues and provide meaningful protections for vulnerable residents in those decisions for affected communities. LRAPA has the power to be more protective and more meaningfully address environmental justice concerns. It is vital that LRAPA adequately serves all members of Lane County—particularly those most vulnerable and those facing cumulative environmental harms in West Eugene. In its response to comments for the Seneca SSE Cogeneration Facility, LRAPA stated that it followed "the key elements of ORS 182.545 as part of [its] Public Participation Policy." Specifically, LRAPA stated that because it posted permit information on the website in both English and Spanish, held the public community information session at a time and place convenient for community members, and did community outreach to organizations representing affected community members, it gave due diligence to environmental justice. While it is admirable that LRAPA has made meaningful strides in public participation and keeping the community abreast of permit-related information and potential health risks, it still falls short in actually protecting public health for those Lane County residents most disproportionately impacted by air pollution. LRAPA should not only be concerned with access to information. It should also meaningfully address the public health impacts of a facility based on the cumulative impacts of increasingly high emissions of regulated air pollutants—particularly PM_{2.5}, FHAPs, and VOC. The West Eugene community has a history of dealing with the numerous health

impacts of PM_{2.5} and has a history of vocalizing concerns about this specific pollutant. Even relatively small increases in air pollution can have a devastating cumulative impact on already overburdened environmental justice communities. LRAPA must take the history of the community, community complaints, and cumulative environmental pollution into account when granting air and setting parameters for air discharge permits—especially ones like the Seneca Sawmill permit that increase hazardous air emissions by over two-fold.

Response 3: Some communities in Lane County may have experienced a higher share of the adverse environmental and public health consequences of industrial air emissions. As the commenter indicated above, LRAPA is working to provide a meaningful opportunity to participate in any permitting decision for a new or existing facility, especially for a facility that has the potential to increase environmental and public health stressors. However, the commenter implies that ORS 182.545 gives state natural resource agencies, and by extension LRAPA, more regulatory authority than the statute actually provides. As part of considering how LRAPA's actions affect environmental justice communities, LRAPA can provide enhanced compliance demonstration in air quality permits and conduct increased enforcement review based on community concerns. LRAPA does not currently have the regulatory authority to set lower or alternative limits in air contaminant discharge permits based on environmental justice concerns. Unlike some other states, notably New Jersey, the environmental justice program in Oregon does not limit the future placement of new facilities or the expansion of existing facilities in overburdened communities.

Comment 4: LRAPA should closely monitor increased fugitive emissions from non-stationary sources at Seneca Sawmill. Increased production at Seneca Sawmill will result in more truck traffic and loading and unloading of hog fuels, wood shavings, sawdust, bark, and other materials that will increase levels of fugitive particulate matter. Due to increased production, LRAPA should put monitoring and reporting requirements in place to track fugitive emissions from truck traffic, loading, unloading, and other activities. Increased production and traffic may result in these fugitive emissions no longer being “categorically insignificant.” For that reason, monitoring and reporting requirements for these emissions is necessary to ensure accurate and up-to-date data. Beyond Toxics understands that LRAPA cannot count these fugitive air emissions as part of Seneca Sawmill's PM emissions limits; however, LRAPA must recognize that an increase in production is not the “status quo” of operation.

Response 4: Under the Clean Air Act, LRAPA regulates only stationary sources of air pollution. In addition, some of the sources of fugitive emissions listed above do not occur at Seneca Sawmill Company. However, LRAPA agrees that the facility may be a source of fugitive emissions from stationary sources and that additional permit conditions related to demonstrating compliance with the fugitive emission requirements under LRAPA Title 48 – Rules for Fugitive Emissions are reasonable. LRAPA has added the following permit conditions that are included in the Oregon Title V Operating Permit template language and are the fugitive emission monitoring requirements typically used by Title V facilities with LRAPA permits:

The permittee must demonstrate compliance with Condition 7 by conducting a fugitive emissions survey. At least once each month for a minimum period of 30 minutes, the permittee must visually survey the facility using EPA Method 22 for any sources of fugitive emissions. For purposes of this condition, fugitive emissions are visible emissions that leave the plant site boundary for a period or periods totaling more than 18 seconds in a six-minute period. The minimum observation time must be at least six (6) minutes. The person conducting the observation must follow EPA Method 22. If sources of fugitive emissions are identified, the permittee must: [LRAPA 34-016(1) and LRAPA 48-015(2)&(3)]

- a. Immediately take corrective action to minimize the fugitive emissions, including but not limited to those actions identified in Condition 7; or

- b. Develop an LRAPA-approved Fugitive Emission Control Plan upon request by LRAPA and implement the plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period.

Additionally, the permit will contain recordkeeping requirements to document the performance of these inspections, including:

The permittee must record the following information in a monitoring log pertaining to Condition 8 for all fugitive emission surveys: date, time, person conducting the survey, any excess fugitive emissions observed, and any corrective actions taken. [LRAPA 34-016(1)]

Comment 5: While we understand that our Seneca Sawmill operations will also be called into the Cleaner Air Oregon program, that action has not yet occurred, and the timeline specific to the sawmill operations has not been set by the Lane Regional Air Protection Agency (LRAPA) or other regulatory agencies. Based on our preference for operating in a science-backed, open, responsive, and proactive environment, SPI requests that LRAPA add the Seneca Sawmill operations to the Cleaner Air Oregon program. While LRAPA had previously assessed the Seneca Sawmill emissions as low priority for the risk reduction program, we believe the Cleaner Air Oregon assessment is to the advantage of our company and the community and see no reason to delay initiating the process. Therefore, it is our formal request that LRAPA complete the current process on our Seneca Sawmill Company permit and issue a permit subject to the state and local regulations. We also ask LRAPA to begin working with us to outline the initial steps and timelines for our voluntary early entry into the Cleaner Air Oregon program.

Response 5: Please see the response to Comment 2.

Comment 6: We have significant concerns about Seneca's proposal to significantly increase production and emissions stemming from the sawmill facility paired with the request to remove the combined emissions limit on FHAPs. What are the reasons for this significant increase in capacity? Has Seneca shown increased demand for capacity?

Response 6: The questions raised by the commenter are considered business decisions to be made by the facility. In general, a facility is not required to justify their business decisions or needs in order to apply for an air quality permit or the modification of an air quality permit. Other governmental agencies may require a needs analysis for construction or modification in specific industries, such as power generation, but this is not an applicable requirement for the wood products industry.

Comment 7: The region's timber industry already operates far beyond the bounds of ecological sustainability. Does Seneca expect other mills to close? Will its capacity increase lead to increases in logging on public lands at a time when carbon-storing, older forest stands are desperately needed to combat the climate crisis? Or will it incentivize even more clearcut logging on privately-owned land followed by monocrop replantings doused in chemical pesticides? The public deserves to know the full range of direct and indirect impacts that would follow Seneca's requested permit modifications, including degradation of water quality, streamflows, fish and wildlife habitat, and carbon sequestration potential. The timber industry is fully mature in this region. Where will Seneca Sawmill get the additional raw materials to support a doubling of milling capacity? Squeezing blood from a turnip by clearcutting younger and younger tree crops on private timberland, and never letting a real forest develop between clearcuts?

Response 7: The commenters raise a number of issues that are important to their organization. However, these issues are not relevant to applying for an air quality permit or determining whether a facility will comply with all applicable air quality rules and regulations.

Comment 8: Finally, page 6 of the Review Report for Seneca Sawmill states: “The dry kilns individually emit more than either the [Typically Achievable Control Technology (TACT)] thresholds under LRAPA 32-008(1)&(2) for VOC emissions. US EPA and LRAPA have determined that there are no control technologies currently used in practice or economically feasible for dry kilns. TACT is considered to be current operations.” “Boiler-3, Boiler-4, and Boiler-5 will only combust natural gas and[/]or will be equipped with low NO_x burners that reduce NO_x and CO emissions. Boilers of this size do not usually have any additional add-on controls. These boilers are considered to meet TACT.” We request that LRAPA require Seneca to explore using other control technologies to address the emissions from these units instead of allowing them to pollute freely. See OAR 340-226-0130.

Response 8: Regarding the dry kilns, LRAPA does not know of any existing technology that would practicably reduce the potential emissions of VOC or federal HAPs. The VOCs and federal HAPs from dry kilns result from the process of controlled heating of dimensional lumber with steam to reduce the moisture content in the wood prior to shipment. This process results in a very low concentration of VOCs and federal HAPs in a large volume of air. Existing control technologies do not economically remove these pollutants and some of the available oxidation control technologies would also increase greenhouse gas emissions. The proposed permit uses work practices to reduce potential emissions of VOCs and federal HAPs. Based on bench scale testing performed at Oregon State University, the emissions of VOC or federal HAPs from the controlled heating of dimensional lumber increase linearly with temperature. The proposed permit limits the maximum temperature for drying wood to no more than 200 °F (3 hour block average).

Regarding the natural gas boilers, these emission units are already proposed to include low NO_x burners which are an inherent control system. As natural gas is considered the cleanest fossil fuel, most control technologies for natural gas boilers are focused on reducing carbon monoxide and nitrogen oxide emissions. No other control technologies would be considered economically feasible for other pollutants emitted by boilers of this size.

Comment 9: Please clarify the applicability of the City of Eugene’s Toxics Right-to-Know Program to Seneca Sawmill Company.

Response 9: Based on available information on the City of Eugene’s Toxics Program website, a Toxic Right-to-Know report must be filed by a business that meets all of the following criteria: (1) the facility is with the Standard Industrial Classifications categories of #20-#39, (2) the facility has 10 or more full-time equivalent employees, (3) that facility is stationary within the city limit of Eugene and is not exempted, and (4) the facility has aggregate inputs of 2,640 pounds of reportable hazardous substances during the reporting year. According to the map available on the City of Eugene’s website, Seneca Sawmill Company is currently located outside the city limits of Eugene.

Comment 10: Why don’t you separate the permit for the sawmill from the biomass plant? It makes no sense to combine them and just makes the whole business more confusing for the public trying to comment on the permit.

Response 10: The commenter’s question is unclear. Seneca Sawmill Company has a separate air quality permit from Seneca Sustainable Energy. As discussed at the public hearings for each facility and at the informational meeting for Seneca Sawmill Company, the only link between the two facilities for air quality permitting is in determining whether each facility is considered a major source of federal hazardous air pollutants. The air quality permit for Seneca Sawmill Company was on public notice from July 12 through August 22, 2022, while the air quality permit for Seneca Sustainable Energy was on public notice from June 9 through July 27, 2022. LRAPA was very clear at each public hearing to emphasize which facility the public hearing applied. Even so, LRAPA did receive a handful of comments during the public notice period for Seneca Sustainable Energy

which also pertained to Seneca Sawmill Company. LRAPA saved those public comments and responded to them as part of this response to comments document.

Comment 11: How can increases in pollution be considered at a time when forest fires and wildland fires are having an ever-increasing adverse impact on air quality and health in our area?

Response 11: Forest fires and wildland fires are considered unusual or naturally occurring events that are not reasonably foreseeable or controllable. Other exceptional events involving particulate matter may include, but are not limited to, high wind dust events, prescribed fires, and volcanic activities. The Clean Air Act is specifically designed to control and reduce emissions that directly result from human activities. As such, intermittent exceptional events are not considered in any air quality permit decisions.

Comment 12: How can increases in the emissions of greenhouse gases be considered when Oregon and communities worldwide are working to reduce emissions of greenhouse gases?

Response 12: LRAPA acknowledges that the state of Oregon and local communities are working to reduce emissions of greenhouse gases as part of the climate crisis fight. However, there are misconceptions about LRAPA's regulatory authority. In general, LRAPA, and by extension Oregon DEQ, do not have the ability to prohibit a facility from increasing production or emitting any pollutant as long as that facility can comply with all applicable federal, state, and local air quality permit regulations and the land use was approved by the applicable local land use planning agency, as applicable. In this case, there are no regulations prohibiting the use or installation of equipment that generates greenhouse gases from the combustion of natural gas.

Public Hearing Comment Receipt Log

Oral comments were received from:

Courtney Griesel Sierra Pacific Industries cgriesel@spi-ind.com	Evan Shenkin evanshenkin1@gmail.com	Kathy Ging kathy@kathyging.com
Sue Craig Interfaith Earthkeepers of Eugene / Springfield sueacraig@gmail.com	--	--

Public Comment Receipt Log

Written comments were received from:

Lisa Arkin Beyond Toxics larkin@beyondtoxics.org	Teryn Yazdani Beyond Toxics yazdani@beyondtoxics.org	David Blick blick38@comcast.net
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Anand Holtham-Keathley Whiteaker Community Council whiteakercommunitycouncil@gmail.com	Sharon Blick livingearthfarm@comcast.net	--

JJW/cmw
 09/20/2022

Seneca Sawmill Company - 207459										
Emission Detail Sheets										
Plant Site Emission Limits										
Pollutant	Original Baseline (TPY)	Revised Baseline (TPY)	Previous Netting Basis (TPY)	Proposed Netting Basis (TPY)	Previous PSEL (TPY)	Proposed PSEL (TPY)	Unassigned Emissions (TPY)	PSEL Increase Over Netting Basis (TPY)	PTE (TPY)	SER (TPY)
PM	25	25	25	25	49	24	5	0	20	25
PM ₁₀	13	21	13	21	27	24	2	3	19	15
PM _{2.5}	NA	NA	8	13	16	22	0	9	19	10
CO	2	2	2	2	99	99	0	97	24	100
NO _x	9	9	9	9	48	39	0	30	24	40
SO ₂	14	14	14	14	53	39	13	25	1.1	40
VOC	10	10	10	10	99	249	0	239	249	40
GHG (CO2 eq.)	0	4,376	0	4,376	74,000	76,933	0	72,557	76,933	75,000
Notes:										

Seneca Sawmill Company - 207459									
Emission Detail Sheets									
Facility Potential Emission Summary									
Criteria Pollutants									
EU ID	Emission Unit Description	Pollutant (TPY)							
		PM	PM ₁₀	PM _{2.5}	CO	NO _x	SO ₂	VOC	GHG
Boiler-3	50 MMBtu/hr NG Boiler	0.53	0.53	0.53	8.10	7.88	0.36	249	25,644
Boiler-4	50 MMBtu/hr NG Boiler	0.53	0.53	0.53	8.10	7.88	0.36		25,644
Boiler-5	50 MMBtu/hr NG Boiler	0.53	0.53	0.53	8.10	7.88	0.36		25,644
Kilns	Ten (10) Dry Kilns	13.50	13.50	13.50	NA	NA	NA		NA
MH	Sawmill/Planing Mill Activities	4.6	3.9	3.9	NA	NA	NA		NA
GDF	Gasoline Dispensing Facility	NA	NA	NA	NA	NA	NA		NA
Total =		20	19	19	24	24	1.1	249	76,933
CAS Number	Pollutant	TPY	Federal HAP	CAO Toxic					
Organics									
75-07-0	Acetaldehyde	30.5	Yes	Yes					
107-02-8	Acrolein	0.49	Yes	Yes					
71-43-2	Benzene	2.4E-02	Yes	Yes					
100-41-4	Ethyl Benzene	2.1E-02	Yes	Yes					
50-00-0	Formaldehyde	0.68	Yes	Yes					
110-54-3	Hexane	5.6E-02	Yes	Yes					
67-56-1	Methanol	29.6	Yes	Yes					
91-20-3	Naphthalene	1.9E-04	Yes	Yes					
NA	POM (inc. PAHs)	2.6E-04	Yes	Yes					
123-38-6	Propionaldehyde	0.32	Yes	Yes					
115-07-1	Propylene	0.34	No	Yes					
108-88-3	Toluene	0.13	Yes	Yes					
540-84-1	2,2,4-Trimethylpentane	2.2E-02	Yes	Yes					
1330-20-7	Xylenes	7.2E-02	Yes	Yes					
Inorganic Gases									
7664-41-7	Ammonia	2.05	No	Yes					
Metals									
7440-38-2	Arsenic	1.3E-04	Yes	Yes					
7440-41-7	Beryllium	7.7E-06	Yes	Yes					
7440-43-9	Cadmium	7.0E-04	Yes	Yes					
7440-47-3	Chromium, Hexavalent	9.0E-04	Yes	Yes					
7439-96-5	Manganese	2.4E-04	Yes	Yes					
7439-97-6	Mercury	1.7E-04	Yes	Yes					
7440-02-0	Nickel	1.3E-03	Yes	Yes					
7782-49-2	Selenium	1.5E-05	Yes	Yes					
Total =		64.3	61.9	64.3					

Seneca Sawmill Company - 207459						
Emission Detail Sheets						
Boiler-3 Emission Calculations						
Boiler Specifications						
Max Heat Input	50	MMBtu/hr				
Heat Value - Natural Gas	1026	MMBtu/MMCF				
Max Hrs Operation	8760	hr/yr				
Criteria Pollutants						
Pollutant	NG Emission Factor (lb/MMCF)	NG Emission Factor Units	Potential Hourly Emissions (lbs/hr)	Potential Annual Emissions (TPY)	NG Emission Factor Conversion	NG Emission Factor Units
PM/PM ₁₀ /PM _{2.5}	2.5	lbs/MMCF	0.12	0.53		
Carbon Monoxide	0.037	lbs/MMBtu	1.85	8.10	38	lbs/MMCF
Nitrogen Oxides	0.036	lbs/MMBtu	1.80	7.88	37	lbs/MMCF
Sulfur Dioxide	1.7	lbs/MMCF	0.08	0.36		
VOCs	5.5	lbs/MMCF	0.27	1.17		
GHGs (CO ₂ equiv.)	117	lbs/MMBtu	5,855	25,644		
HAP Emissions						
Pollutant	NG Emission Factor (lb/MMCF)	Potential Hourly Emissions (lbs/hr)	Potential Annual Emissions (TPY)	Federal HAP	CAO Air Toxic	
Organics						
Acetaldehyde	0.0031	1.5E-04	6.6E-04	Yes	Yes	
Acrolein	0.0027	1.3E-04	5.8E-04	Yes	Yes	
Benzene	0.0058	2.8E-04	1.2E-03	Yes	Yes	
Ethyl Benzene	0.0069	3.4E-04	1.5E-03	Yes	Yes	
Formaldehyde	0.0123	6.0E-04	2.6E-03	Yes	Yes	
Hexane	0.0046	2.2E-04	9.8E-04	Yes	Yes	
Naphthalene	0.0003	1.5E-05	6.4E-05	Yes	Yes	
POM (inc. PAHs)	0.0004	1.9E-05	8.5E-05	Yes	Yes	
Propylene	0.5300	2.6E-02	1.1E-01	No	Yes	
Toluene	0.0265	1.3E-03	5.7E-03	Yes	Yes	
Xylenes	0.0197	9.6E-04	4.2E-03	Yes	Yes	
Inorganic Gases						
Ammonia	3.2000	1.6E-01	6.8E-01	No	Yes	
Metals						
Arsenic	2.0E-04	9.7E-06	4.3E-05	Yes	Yes	
Beryllium	1.2E-05	5.8E-07	2.6E-06	Yes	Yes	
Cadmium	1.1E-03	5.4E-05	2.3E-04	Yes	Yes	
Chromium, Hexavalent	1.4E-03	6.8E-05	3.0E-04	Yes	Yes	
Manganese	3.8E-04	1.9E-05	8.1E-05	Yes	Yes	
Mercury	2.6E-04	1.3E-05	5.5E-05	Yes	Yes	
Nickel	2.1E-03	1.0E-04	4.5E-04	Yes	Yes	
Selenium	2.4E-05	1.2E-06	5.1E-06	Yes	Yes	
Total =	3.82		0.81	0.02	0.81	
GHG-Related Emission Factors						
Pollutant	Natural Gas (kg/MMBtu)	GWP				
Carbon Dioxide (CO ₂)	53.06	1				
Methane (CH ₄)	1.0E-03	25				
Nitrous Oxide (N ₂ O)	1.0E-04	298				
Notes:						
NOx and CO emission factors are based on manufacturer guarantees						
PM/PM ₁₀ /PM _{2.5} , SO ₂ , and VOC emissions factors are based on DEQ Emission Factors Gas Fired Boilers, AQ-EF05 (08/01/2011)						
GHG emission factors are from 40 CFR 98, Tables C-1 and C-2						
Toxics emission factors, except for metals and ammonia, are based on Ventura County APCD "AB 2588 Combustion Emission Factors"						
Toxics emission factors for metals are based on US EPA AP-42 Section 1.4 - Natural Gas Combustion (07/1998)						
Ammonia emission factor is based on US EPA WebFire SCC 1-002-006-02 for an uncontrolled boiler						
Chromium assumed to be hexavalent						

Seneca Sawmill Company - 207459						
Emission Detail Sheets						
Boiler-3 Emission Calculations						
Boiler Specifications						
Max Heat Input	50	MMBtu/hr				
Heat Value - Natural Gas	1026	MMBtu/MMCF				
Max Hrs Operation	8760	hr/yr				
Criteria Pollutants						
Pollutant	NG Emission Factor (lb/MMCF)	NG Emission Factor Units	Potential Hourly Emissions (lbs/hr)	Potential Annual Emissions (TPY)	NG Emission Factor Conversion	NG Emission Factor Units
PM/PM ₁₀ /PM _{2.5}	2.5	lbs/MMCF	0.12	0.53		
Carbon Monoxide	0.037	lbs/MMBtu	1.85	8.10	38	lbs/MMCF
Nitrogen Oxides	0.036	lbs/MMBtu	1.80	7.88	37	lbs/MMCF
Sulfur Dioxide	1.7	lbs/MMCF	0.08	0.36		
VOCs	5.5	lbs/MMCF	0.27	1.17		
GHGs (CO ₂ equiv.)	117	lbs/MMBtu	5,855	25,644		
HAP Emissions						
Pollutant	NG Emission Factor (lb/MMCF)	Potential Hourly Emissions (lbs/hr)	Potential Annual Emissions (TPY)	Federal HAP	CAO Air Toxic	
Organics						
Acetaldehyde	0.0031	1.5E-04	6.6E-04	Yes	Yes	
Acrolein	0.0027	1.3E-04	5.8E-04	Yes	Yes	
Benzene	0.0058	2.8E-04	1.2E-03	Yes	Yes	
Ethyl Benzene	0.0069	3.4E-04	1.5E-03	Yes	Yes	
Formaldehyde	0.0123	6.0E-04	2.6E-03	Yes	Yes	
Hexane	0.0046	2.2E-04	9.8E-04	Yes	Yes	
Naphthalene	0.0003	1.5E-05	6.4E-05	Yes	Yes	
POM (inc. PAHs)	0.0004	1.9E-05	8.5E-05	Yes	Yes	
Propylene	0.5300	2.6E-02	1.1E-01	No	Yes	
Toluene	0.0265	1.3E-03	5.7E-03	Yes	Yes	
Xylenes	0.0197	9.6E-04	4.2E-03	Yes	Yes	
Inorganic Gases						
Ammonia	3.2000	1.6E-01	6.8E-01	No	Yes	
Metals						
Arsenic	2.0E-04	9.7E-06	4.3E-05	Yes	Yes	
Beryllium	1.2E-05	5.8E-07	2.6E-06	Yes	Yes	
Cadmium	1.1E-03	5.4E-05	2.3E-04	Yes	Yes	
Chromium, Hexavalent	1.4E-03	6.8E-05	3.0E-04	Yes	Yes	
Manganese	3.8E-04	1.9E-05	8.1E-05	Yes	Yes	
Mercury	2.6E-04	1.3E-05	5.5E-05	Yes	Yes	
Nickel	2.1E-03	1.0E-04	4.5E-04	Yes	Yes	
Selenium	2.4E-05	1.2E-06	5.1E-06	Yes	Yes	
Total =	3.82		0.81	0.02	0.81	
GHG-Related Emission Factors						
Pollutant	Natural Gas (kg/MMBtu)	GWP				
Carbon Dioxide (CO ₂)	53.06	1				
Methane (CH ₄)	1.0E-03	25				
Nitrous Oxide (N ₂ O)	1.0E-04	298				
Notes:						
NOx and CO emission factors are based on manufacturer guarantees						
PM/PM ₁₀ /PM _{2.5} , SO ₂ , and VOC emissions factors are based on DEQ Emission Factors Gas Fired Boilers, AQ-EF05 (08/01/2011)						
GHG emission factors are from 40 CFR 98, Tables C-1 and C-2						
Toxics emission factors, except for metals and ammonia, are based on Ventura County APCD "AB 2588 Combustion Emission Factors"						
Toxics emission factors for metals are based on US EPA AP-42 Section 1.4 - Natural Gas Combustion (07/1998)						
Ammonia emission factor is based on US EPA WebFire SCC 1-002-006-02 for an uncontrolled boiler						
Chromium assumed to be hexavalent						

Seneca Sawmill Company - 207459						
Emission Detail Sheets						
Boiler-5 Emission Calculations						
Boiler Specifications						
Max Heat Input	50	MMBtu/hr				
Heat Value - Natural Gas	1026	MMBtu/MMCF				
Max Hrs Operation	8760	hr/yr				
Criteria Pollutants						
Pollutant	NG Emission Factor (lb/MMCF)	NG Emission Factor Units	Potential Hourly Emissions (lbs/hr)	Potential Annual Emissions (TPY)	NG Emission Factor Conversion	NG Emission Factor Units
PM/PM ₁₀ /PM _{2.5}	2.5	lbs/MMCF	0.12	0.53		
Carbon Monoxide	0.037	lbs/MMBtu	1.85	8.10	38	lbs/MMCF
Nitrogen Oxides	0.036	lbs/MMBtu	1.80	7.88	37	lbs/MMCF
Sulfur Dioxide	1.7	lbs/MMCF	0.08	0.36		
VOCs	5.5	lbs/MMCF	0.27	1.17		
GHGs (CO ₂ equiv.)	117	lbs/MMBtu	5,855	25,644		
HAP Emissions						
Pollutant	NG Emission Factor (lb/MMCF)	Potential Hourly Emissions (lbs/hr)	Potential Annual Emissions (TPY)	Federal HAP	CAO Air Toxic	
Organics						
Acetaldehyde	0.0031	1.5E-04	6.6E-04	Yes	Yes	
Acrolein	0.0027	1.3E-04	5.8E-04	Yes	Yes	
Benzene	0.0058	2.8E-04	1.2E-03	Yes	Yes	
Ethyl Benzene	0.0069	3.4E-04	1.5E-03	Yes	Yes	
Formaldehyde	0.0123	6.0E-04	2.6E-03	Yes	Yes	
Hexane	0.0046	2.2E-04	9.8E-04	Yes	Yes	
Naphthalene	0.0003	1.5E-05	6.4E-05	Yes	Yes	
POM (inc. PAHs)	0.0004	1.9E-05	8.5E-05	Yes	Yes	
Propylene	0.5300	2.6E-02	1.1E-01	No	Yes	
Toluene	0.0265	1.3E-03	5.7E-03	Yes	Yes	
Xylenes	0.0197	9.6E-04	4.2E-03	Yes	Yes	
Inorganic Gases						
Ammonia	3.2000	1.6E-01	6.8E-01	No	Yes	
Metals						
Arsenic	2.0E-04	9.7E-06	4.3E-05	Yes	Yes	
Beryllium	1.2E-05	5.8E-07	2.6E-06	Yes	Yes	
Cadmium	1.1E-03	5.4E-05	2.3E-04	Yes	Yes	
Chromium, Hexavalent	1.4E-03	6.8E-05	3.0E-04	Yes	Yes	
Manganese	3.8E-04	1.9E-05	8.1E-05	Yes	Yes	
Mercury	2.6E-04	1.3E-05	5.5E-05	Yes	Yes	
Nickel	2.1E-03	1.0E-04	4.5E-04	Yes	Yes	
Selenium	2.4E-05	1.2E-06	5.1E-06	Yes	Yes	
Total =	3.82		0.81	0.02	0.81	
GHG-Related Emission Factors						
Pollutant	Natural Gas (kg/MMBtu)	GWP				
Carbon Dioxide (CO ₂)	53.06	1				
Methane (CH ₄)	1.0E-03	25				
Nitrous Oxide (N ₂ O)	1.0E-04	298				
Notes:						
NOx and CO emission factors are based on manufacturer guarantees						
PM/PM ₁₀ /PM _{2.5} , SO ₂ , and VOC emissions factors are based on DEQ Emission Factors Gas Fired Boilers, AQ-EF05 (08/01/2011)						
GHG emission factors are from 40 CFR 98, Tables C-1 and C-2						
Toxics emission factors, except for metals and ammonia, are based on Ventura County APCD "AB 2588 Combustion Emission Factors"						
Toxics emission factors for metals are based on US EPA AP-42 Section 1.4 - Natural Gas Combustion (07/1998)						
Ammonia emission factor is based on US EPA WebFire SCC 1-002-006-02 for an uncontrolled boiler						
Chromium assumed to be hexavalent						

Seneca Sawmill Company - 207459										
Emission Detail Sheets										
Dry Kilns										
Max Kiln Production	540,000	MBF/yr								
Max Drying Temp	200	°F								
Max Kiln VOC PTE	249	TPY								
Criteria Pollutants										
Pollutant	100% Douglas Fir			100% Hemlock Fir			Kiln Max Capacity Emissions (TPY)	Kiln PTE Potential Emissions (TPY)	Federal HAP	CAO Air Toxic
	Green Emission Factor (lb/MBF)	Burnt Emission Factor (lb/MBF)	Capacity Emissions (TPY)	Green Emission Factor (lb/MBF)	Burnt Emission Factor (lb/MBF)	Capacity Emissions (TPY)				
VOC	1.116	0.669	301	0.396	0.238	107.0	301	249		
PM/PM ₁₀ /PM _{2.5}	0.020	0.020	5.40	0.050	0.050	13.5	13.5	13.5		
FHAPs										
Pollutant	100% Douglas Fir			100% Hemlock Fir			Kiln Max Capacity Emissions (TPY)	Requested Kiln PTE Potential Emissions (TPY)	Federal HAP	CAO Air Toxic
	Green Emission Factor (lb/MBF)	Burnt Emission Factor (lb/MBF)	Capacity Emissions (TPY)	Green Emission Factor (lb/MBF)	Burnt Emission Factor (lb/MBF)	Capacity Emissions (TPY)				
Acetaldehyde	0.0430	0.0258	11.61	0.1128	0.0677	30.5	30.5	30.5	Yes	Yes
Acrolein	0.0008	0.0005	0.22	0.0018	0.0011	0.49	0.49	0.49	Yes	Yes
Formaldehyde	0.0025	0.0015	0.68	0.0021	0.0012	0.56	0.68	0.56	Yes	Yes
Methanol	0.0754	0.0452	20.36	0.1097	0.0658	29.6	29.6	29.6	Yes	Yes
Propionaldehyde	0.0009	0.0005	0.24	0.0012	0.0007	0.32	0.32	0.32	Yes	Yes
Total =	0.1226	0.0736		0.2276	0.1366					
Notes:										
VOC and HAP emission factors are from DEQ HAP and VOC Emission Factors for Lumber Drying, 2021, AQ-EF09 assuming a maximum kiln temperature of 200°F										
PM/PM ₁₀ /PM _{2.5} emission factors are from DEQ Emission Factors Wood Products, AQ-EF02 (08/01/2011)										
Burnt emission factors are based on the assumption in the application for NC-207459-A20 that burnt wood organic compound emissions are 60% of green wood										

Seneca Sawmill Company - 207459					
Emission Detail Sheets					
Gasoline Dispensing Facility					
Vehicles Equipped with ORVR in Lane County =		65	percent		
GDF Activity - VOC Emissions (Submerged Fill Only)					
	Tank Filling =	7.70	lbs/Mgals		
	Breathing =	1.00	lbs/Mgals		
	Refueling - No ORVR =	10.36	lbs/Mgals		
	Refueling - ORVR =	0.21	lbs/Mgals		
	Spillage =	0.61	lbs/Mgals		
	Hose Permeation =	0.062	lbs/Mgals		
	Total =	13.13	lbs/Mgals		
	gal/mo	gal/yr			
Max GDF Throughput =	31,500	378,000			
	Potential Hourly Emissions (lbs/hr)	Potential Annual Emissions (TPY)			
Pollutant					
VOC	0.57	2.48			
GDF Activity - HAP Emissions					
			Potential Emissions	Federal HAP	CAO Air Toxic
Pollutant	% by wt.	lbs/Mgals	TPY		
Benzene	0.82	0.11	0.020	Yes	Yes
Ethyl Benzene	0.66	0.09	0.016	Yes	Yes
Hexane	2.14	0.28	0.053	Yes	Yes
Toluene	4.36	0.57	0.108	Yes	Yes
2,2,4-Trimethylpentane	0.89	0.12	0.022	Yes	Yes
Xylenes, Total	2.39	0.31	0.059	Yes	Yes
		Total =	0.28	0.28	0.28
Notes:					
ORVR = Onboard Refueling Vapor Recovery					
Tank filling emission factor from CARB "Revised Emission Factors for Gasoline Marketing Operations at California Gasoline Dispensing Facilities (2013) - Table IV-I.					
Breathing emission factor from US EPA AP-42, Table 5.2-7.					
Refueling emission factor with no ORVR based on DEQ 2018 GDF VOC Estimates.					
Refueling emission factor with ORVR based on DEQ 2018 GDF VOC Estimates.					
Spillage emission factor from CARB "Revised Emission Factors for Gasoline Marketing Operations at California Gasoline Dispensing Facilities (2013) - Table VI-I.					
Hose permeation emission factor from CARB "Revised Emission Factors for Gasoline Marketing Operations at California Gasoline Dispensing Facilities (2013) - Table VII-I.					
FHAP weight percentages based on EPA Speciate v. 4.5.					

Seneca Sawmill Company - 207459												
Emission Detail Sheets												
Baseline/Netting Basis Adjustment												
	Original Baseline						Revised Baseline					
	1977 or	PM		PM ₁₀			PM		PM ₁₀		PM _{2.5}	
Seneca Sawmill	1978	Emission	PM	Emission	PM ₁₀	PM _{2.5}	Emission	PM	Emission	PM ₁₀	Emission	PM _{2.5}
	Thruput	Factor	Baseline	Factor	Baseline	Baseline	Factor	Baseline	Factor	Baseline	Factor	Baseline
Mill A	(BDT)	(lb/BDT)	(TPY)	(lb/BDT)	(TPY)	(TPY)	(lb/BDT)	(TPY)	(lb/BDT)	(TPY)	(lb/BDT)	(TPY)
Chip Cyclone	12240	0.5	3.06	0.25	1.53	0.90	0.5	3.06	0.43	2.63	0.25	1.53
Chip Bin	12240	0.1	0.61	0.05	0.31	0.18	0.1	0.61	0.085	0.52	0.05	0.31
Sawdust Cyclone	8970	0.5	2.24	0.25	1.12	0.66	0.5	2.24	0.43	1.93	0.25	1.12
Sawdust Bin	8970	0.1	0.45	0.05	0.22	0.13	0.1	0.45	0.085	0.38	0.05	0.22
Mill B												
Chip Cyclone	18720	0.5	4.68	0.25	2.34	1.38	0.5	4.68	0.43	4.02	0.25	2.34
Chip Bin	18720	0.1	0.94	0.05	0.47	0.28	0.1	0.94	0.085	0.80	0.05	0.47
Sawdust Bin	8970	0.1	0.45	0.05	0.22	0.13	0.1	0.45	0.085	0.38	0.05	0.22
Planer Cyclone	9240	0.5	2.31	0.25	1.16	0.68	0.5	2.31	0.43	1.99	0.25	1.16
2 Railroad Chip Cyclones and Bins	31680	0.5	7.92	0.25	3.96	2.34	0.5	7.92	0.43	6.81	0.25	3.96
Planer Baghouse	10080	0.001	5.0E-03	0.001	0.01	3.0E-03	0.001	0.01	0.001	0.01	0.001	3.0E-03
Oil-Fired Kiln/Boiler			0.30		0.30	0.30		0.30		0.30		0.30
Gas-Fired Kiln			0.30		0.30	0.30		0.30		0.30		0.30
Tree Products												
Shavings Cyclone	5096	0.5	1.27	0.25	0.64	0.38	0.5	1.27	0.43	1.10	0.25	0.64
2 Gas-Fired Boilers			0.30		0.30	0.30		0.30		0.30		0.30
		Total =	25		13	8		25		21		13
Notes:												
Baseline thruput is based on the review report for SM ACDP issued on 01/26/1996.												
Original baseline was established for PM in the review report for the SM ACDP issued on 01/26/1996.												
Original baseline PM emissions factors for material handling were based upon DEQ emission factors from 11/15/1993.												
Original PM ₁₀ baseline emission factors for material handling were based upon DEQ emission factors from the general ACDP for sawmill, planing mill, millwork, plywood manufacturing and veneer drying.												
Original PM _{2.5} baseline emissions assumed a ratio of 0.59 for PM _{2.5} to PM ₁₀ .												
Revised baseline is based on DEQ emission factors from the 10/10/2017 General ACDP for sawmill, planing mill, millwork, plywood manufacturing and veneer drying.												