



September 28, 2021

Mr. Brent Way, EH&S Coordinator  
Seneca Sustainable Energy, LLC  
P.O. Box 851  
Eugene, OR 97440

Mr. Way,

Lane Regional Air Protection Agency (LRAPA) has completed the review of the Level 3 Risk Assessment submitted on March 31, 2021 by Seneca Sustainable Energy (SSE) in Eugene, Oregon as part of the Cleaner Air Oregon (CAO) program. LRAPA concludes that the Level 3 Risk Assessment is complete and satisfies the CAO requirements for performing a risk assessment pursuant to OAR 340-245-0050. The results of the risk assessment demonstrate that the facility has an Acute Hazard Index (HI) risk above the Source Permit Level of 0.5 and the facility will require toxic air contaminant permit conditions.

The next step in the CAO review process is for SSE to submit an application for a Toxic Air Contaminant Permit Addendum (TACPA) as required under OAR 340-245-0100 using Form AQ106CAO (<http://www.lrapa.org/DocumentCenter/View/4452/aqp106CAOapp.pdf>) and submit the appropriate fee under LRAPA section 37-8030, Table 3. Because SSE conducted a Level 3 Risk Assessment and the results of that risk assessment demonstrate that a permit amendment is required, the fee for a source holding a Title V permit is \$19,900. The TACPA and the appropriate fee must be submitted to LRAPA no later than October 28, 2021. As part of the TACPA submittal, SSE is encouraged to provide suggested language to limit the facility risk and/or emissions, as applicable.

Please do not hesitate to contact LRAPA with any questions or clarifications regarding this letter. I can be contacted directly at either (541) 736-1056 ext. 236 or [jonathan@lrapa.org](mailto:jonathan@lrapa.org). Failure to provide additional information, corrections or updates required by LRAPA may result in a violation of OAR 340-245-0030(1). LRAPA appreciates SSE's efforts in complying with Cleaner Air Oregon.

Sincerely,

Jonathan Wright  
Environmental Engineer

Cc: Max Hueftle, LRAPA (via email)  
John Browning, Bridgewater Group (via email)