



December 29, 2023

Certified Mail and E-mail

Bill Powell  
Oregon Area Manager  
Seneca Sawmill Company  
P.O. Box 851  
Eugene, OR 97440

Re: Cleaner Air Oregon (CAO) Call-in

Dear Bill Powell:

This letter provides written notice to you in accordance with OAR 340-245-0050 that Seneca Sawmill Company, LRAPA Source Number 207459, has been called in to the Cleaner Air Oregon (CAO) program.

This CAO call-in action reflects Seneca Sawmill Company's proactive request to be called into CAO as part of the permit renewal process that concluded with the issuance of the renewed Standard Air Contaminant Discharge Permit on September 20, 2022. 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 is providing Seneca Sawmill Company a notice in accordance with OAR 340-245-0050 that they are being called-in to the CAO program in 2023.

Governor Kate Brown initiated the CAO program in 2016. The goal of CAO is to better understand emissions of toxic air contaminants and evaluate potential health risks to people near commercial and industrial facilities that emit regulated toxic air contaminants, communicate those results to affected communities, and if needed, reduce those risks to below health-based standards.

Seneca Sawmill Company must perform a risk assessment in accordance with the rules adopted by the Environmental Quality Commission (EQC). LRAPA is provided authority by the EQC to implement the CAO program in [OAR 340-245-0010\(3\)](#). Because Seneca Sawmill Company is planning to modify the existing facility starting in 2024, LRAPA will require the risk assessment to be based on the proposed reconfigured facility. If Seneca Sawmill Company does not modify the existing facility as proposed, LRAPA may require a new risk assessment to be completed in the future.

The risk assessment will require you to provide information about current and potential emissions (e.g., production activities, emissions units, and control devices). This information will be used in conjunction with other data about where your facility is located to estimate risks to the surrounding community as required under Oregon Administrative Rules [\(OAR\) 340-245-0050\(1\)\(a\)](#):

*(a)When notified in writing by [LRAPA], at [LRAPA's] discretion, the owner or operator of an existing source with an operating permit must either demonstrate that it is an exempt source or:*

(A) Assess risk from the source using any of the Level 1 through Level 4 Risk Assessment procedures in sections (8) through (11);

(B) Assess risk from the source using the emissions inventory submitted under OAR 340-245-0040(1); and

(C) Follow the applicable calculation procedures under OAR 340-245-0200. Next Steps

1. Submit the CAO Pre-Application Fee form ([AQ500](#) and [Instructions](#)) with payment of the Call-In Fee by January 28, 2024, as identified in [OAR 340-245-0400\(3\)](#). The CAO Call-In fee associated with your Standard Air Contaminant Discharge Permit is \$10,000.
2. Submit the CAO Emissions Inventory Form ([AQ520](#)) by March 28, 2024, as required under [OAR 340-245-0030\(1\)\(a\)](#). For most facilities, this emissions inventory will be more detailed than the toxic air contaminant emissions inventory submitted in 2017 or 2021 because it will include information about maximum daily emissions as well as annual average emissions. If you wish to complete additional testing, this may affect submittal deadlines.

LRAPA will need to be able to verify the information submitted in your Emissions Inventory. In order for LRAPA to be able to approve your submission, please be sure to provide all supporting documents, including emissions factors and calculation methods. LRAPA will consider submissions incomplete if submitted without supporting information.

Information about CAO permitting, including the forms mentioned above and a flow chart showing the risk assessment process can be found on DEQ's CAO website at <https://www.oregon.gov/deq/aq/aqPermits/Pages/CAO-req.aspx>.

LRAPA is available for consultation prior to reviewing and approving information submittals for the CAO permitting process, including the Emissions Inventory, Modeling Protocol, Risk Assessment Work Plan (if you plan to complete a Level 3 or Level 4 risk assessment) and the Risk Assessment itself. Once the risk assessment is complete and approved, the Risk Action Levels in [OAR 340-245-8010](#) determine whether additional action is required.

Your contact for CAO risk assessment work is:

Jonathan Wright, Environmental Engineer

541-736-1056, ext. 236

[jonathan@lrapa.org](mailto:jonathan@lrapa.org)

Please contact LRAPA to clarify any questions you may have regarding the emissions inventory and risk assessment process. We look forward to working with you.

Sincerely,



Max Hueftle, P.E., BCEE

Operations Manager

(541) 736-1056, ext. 231

Email: [max@lrapa.org](mailto:max@lrapa.org)

Cc: Susannah Sbragia, LRAPA Interim Director  
Jonathan Wright, LRAPA Permit Writer  
File