



PUBLIC NOTICE

Date posted: April 17, 2024

LRAPA Virtual Public Hearing and Request for Comments on Draft and Proposed Air Quality Permits for Seneca Sawmill Company

HOW TO PROVIDE PUBLIC COMMENT

Facility name: Seneca Sawmill Company

Permit number: 207459

Permit types: Title V Operating Permit and Standard Air Contaminant Discharge Permit

Hearing details:

Tuesday, May 21, 2024 at 5:30 p.m.

<https://us02web.zoom.us/j/82479638394>

Submit written comments:

By mail: Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477

By email: permitting@lrapa.org

Comments due by: Tuesday, June 4, 2024 at 5 p.m.

The Lane Regional Air Protection Agency invites the public to submit written comments on the conditions of the proposed Standard Air Contaminant Discharge Permit (ACDP) and the draft initial Title V Operating Permit for Seneca Sawmill Company ("facility" or "SSC").

Summary

LRAPA last issued a Standard ACDP to this facility on September 20, 2022, with an expiration date of September 20, 2027. The facility submitted a modification application to rebuild and relocate parts of the facility on January 15, 2024. This modification is considered a Type 3 change under LRAPA section 34-035 and is considered a Non-PSD/NSR Moderate Technical Permit Modification under LRAPA section 37-8020, Table 2, Part 4. Specific Activity Fees.

On September 13, 2023, the facility submitted an initial Title V Operating Permit application for this facility. This application was due within 12 months of the issuance of the Standard ACDP issued on September 20, 2022, which allowed the facility to have potential emissions of criteria and/or federal hazardous air pollutants greater than the major source thresholds applicable to a Title V source. The draft Title V Operating Permit includes all the requirements contained in the proposed Standard ACDP discussed above.

This facility was required to complete a health-based air toxics risk assessment under Cleaner Air Oregon as part of the application for the modified Standard ACDP. LRAPA has concluded the results of this Level 3 Risk Assessment meet health risk standards for the community and do not require additional controls in order to be protective of public health. The proposed Standard ACDP and the draft Title V Operating Permit include operational limitations to maintain this protection.

About the facility

SSC is owned by Sierra Pacific Industries and operates a sawmill at 90201 Highway 99N, Eugene, Oregon. The facility began operation at the current location in 1954.

What air pollutants would the permit regulate?

This permit regulates emissions of the pollutants listed in the tables at the end of this document.

How does LRAPA determine permit requirements?

LRAPA evaluates types and amounts of pollutants and the facility's location and determines permit requirements according to state and federal regulations.

How does LRAPA monitor compliance with the permit requirements?

This permit will require the facility to monitor pollutants using federally-, state-, and locally-approved monitoring practices and standards. The facility will be required to compile this data into an annual report for submission to LRAPA for compliance evaluation. LRAPA will also perform regular compliance inspections of the facility to assure compliance with the permit requirements.

How do I attend the public hearing?

The facility has requested that a public hearing be scheduled for these permitting actions. Anyone desiring to give testimony concerning the applications or permits which might assist LRAPA in concluding the issuance of the permits for this facility is urged to do so.

When: Tuesday, May 21, 2024

- Information session begins at **5:30 p.m.**
- Public hearing begins **after** the information session

Zoom Information: By Video:
<https://us02web.zoom.us/j/82479638394>
By Telephone:
+1 253 215 8782
Webinar ID: 839 8386 7065

If the requesting party wishes to add an in-person component to the virtual hearing, they must provide a justification for this request. This justification should explicitly outline the need for an in-person component, taking into consideration that virtual hearings are the default format due to the cost and resource limitations of the agency. If the justification is deemed sufficient by LRAPA, a hybrid hearing that includes both virtual and in-person components will be scheduled at a reasonable place and time to allow interested persons to submit oral or written comments.

What happens after the public hearing and after the public comment period ends?

After the public comment period ends, including any public hearing, LRAPA will consider and respond to all relevant comments received during the public comment period and may modify the proposed Standard ACDP and Title V Operating Permit based on comments. If a facility meets all legal requirements, LRAPA will issue the facility a modified Standard ACDP after the public comment period. After incorporating any relevant comments received, a proposed initial Title V Operating Permit will be forwarded to the US EPA for up to 45 days of review. If the US EPA does not object to issuance of the Title V Operating Permit, LRAPA will issue the facility an initial Title V Operating Permit.

Where can I get more information?

View the proposed Standard ACDP, draft Title V Operating Permit, and associated review reports at <https://www.lrapa.org/air-quality-protection/public-calendar/> or contact LRAPA at:

Phone: 541-736-1056

Email: permitting@lrapa.org

To view the permit applications and related documents in person at the LRAPA office in Springfield, Oregon, please call LRAPA at the phone number listed above to schedule an appointment.

Non-discrimination statement

LRAPA does not discriminate on the basis of race, color, national origin, age, sex, disability, sexual orientation, or marital status in administration of its programs or activities. View LRAPA's [non-discrimination policy](#).

Emissions limits

Criteria Pollutants and Greenhouse Gases: Table 1 below presents maximum **allowable** emissions of criteria pollutants and greenhouse gases for the facility. The current emission limit reflects maximum emissions that the facility can emit under the existing permit. The proposed emission limit reflects maximum emissions that the facility would be able to emit under the proposed Standard ACDP and the draft Title V Operating Permit. Typically, a facility's actual emissions are less than maximum limits established in a permit; however, actual emissions can increase up to the permitted limit. A proposed emission limit of de minimis means that the facility does not emit this pollutant above the de minimis emission level as defined in LRAPA [title 12](#).

Table 1

Criteria Pollutant	Current Limit (tons/yr)	Proposed Limit (tons/yr)	2023 Actual Emissions (tons/yr)
Particulate matter (PM)	24	22	4.7
Coarse particulate matter (PM ₁₀)	24	22	4.6
Fine particulate matter (PM _{2.5})	22	22	4.6
Carbon monoxide	99	24	2.9
Nitrogen oxides	39	25	3.0
Sulfur dioxide	39	1.1	0.1
Volatile organic compounds	249	249	179
Greenhouse gases (CO ₂ eq.)	76,933	76,933	9,470

For more information about criteria pollutants, visit EPA's [Criteria Air Pollutant web page](#).

Hazardous air pollutants: This facility is a major source of federal hazardous air pollutants (HAP) emissions because potential emissions exceed the major source thresholds. A major source of federal HAPs has potential emissions for an individual federal HAP that exceed ten (10) tons per year or potential emissions for the aggregate of all federal HAPs that exceed 25 tons per year. Table 2 lists the potential and actual emissions of the two highest individual federal HAP and the aggregate of all federal HAPs emitted by the source. For more information about hazardous air pollutants, visit EPA's [Health Effects Notebook for Hazardous Air Pollutants](#).

Table 2

Hazardous Air Pollutant	CAS Number	Potential Emissions (tons/yr)	2023 Actual Emissions (tons/yr)
Acetaldehyde	75-07-0	30.5	8.6
Methanol	67-56-1	29.6	13.4
Total HAP Emissions =		61.9	22.8

