



June 15, 2020

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 emissions inventory information submitted by Seneca Sustainable Energy (SSE) in Eugene, Oregon as part of the Cleaner Air Oregon (CAO) program.

The initial emissions inventory submittal from SSE was received on February 27, 2020. At the request of LRAPA, SSE provided additional information on March 30, 2020 based on a more recent source of emission factors and clarified the calculation methodology for certain pollutants. On May 4, 2020 SSE submitted a final version of the emission inventory for steady state operations at maximum boiler heat input. On June 11, 2020 SSE provided LRAPA a separate emission inventory that represents startup emissions.

The next step in the CAO review process is for SSE to begin a risk assessment of the facility. The submittals required for the risk assessment are based upon the risk assessment level SSE chooses to complete. Submittals required under the risk assessment process are listed in OAR 340-245-0030(b) through (f). SSE has previously indicated to LRAPA the intention to complete a Level 3 Risk Assessment. Under a Level 3 Risk Assessment, SSE must provide LRAPA the following submittals by the dates indicated:

- A modeling protocol no later than July 15, 2020. Modeling protocol requirements are listed in OAR 340-245-0210(1)(a).
- A risk assessment work plan (RAWP) no later than August 14, 2020. RAWP requirements are listed in OAR 340-245-0210(2).



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. 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)