

**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/>

Source Information:

Primary SIC	2421 - Sawmill/Planing Mill
Secondary SIC	4961 - Steam/AC Supply
Primary NAICS	321113
Secondary NAICS	221330

Source Categories (LRAPA Title 37, Table 1)	B:62. – Sawmills and/or planing mills 25,000 or more board feet/maximum 8 hour finished product
Public Notice Category	III

Compliance and Emissions Monitoring Requirements:

Unassigned Emissions	N
Emission Credits	N
Special Conditions	N
Compliance Schedule	N

Source Test [date(s)]	N
COMS	N
CEMS	N
Ambient monitoring	N

Reporting Requirements

Annual Report (due date)	March 1
SACC (due date)	N
GHG Report (due date)	March 31
NSPS Report (due date)	N

Monthly Report (due dates)	N
Excess Emissions Report	Y
Other Reports (due date) - Title 44 Report	February 15

Air Programs

NSPS (list subparts)	Dc, IIII
NESHAP (list subparts)	ZZZZ, CCCCC
CAM	N
Regional Haze (RH)	N
Synthetic Minor (SM)	N
SM-80	Y (HAPs)
Title V	N
Part 68 Risk Management	N
ACDP (SIP)	N
Major FHAP Source	N
Federal Major Source	N
New Source Review (NSR)	N
Prevention of Significant Deterioration (PSD)	N
Acid Rain	N

Clean Air Mercury Rule (CAMR)	N
TACT	N

Permittee Identification

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

General Background

2. The facility uses six (6) dry kilns to dry dimensional lumber. The steam for the dry kilns is primarily provided by Seneca Sustainable Energy ("SSE" - 206470), which is located on contiguous property. The facility also has a 50 MMBtu per hour natural gas-fired boiler that can supply steam when Seneca Sustainable Energy is not operational. The particulate matter emissions from cutting, planing and chipping operations are controlled by five (5) cyclones and three (3) baghouses.
3. As part of this ACDP renewal, the facility has requested the removal of fuel oil backup capability on the 50 MMBtu per hour boiler. The 50 MMBtu per hour boiler was originally permitted to use natural gas and fuel oil backup in case of natural gas curtailment. However, the boiler has never combusted fuel oil and has no fuel oil tank. The facility has requested the 50 MMBtu per hour boiler be permitted to combust natural gas only.
4. Seneca Sawmill Company 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. Seneca Sawmill Company purchased this facility in April 1993. LRAPA subsequently merged the two facilities under the Seneca Sawmill permit identification number. The baselines for the two facilities were also merged.
5. Seneca Sawmill Company is contiguous with Seneca Sustainable Energy (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 air contaminant emitting activities do not belong to the same two-digit SIC code. LRAPA does not consider Seneca Sawmill Company to be a support facility for Seneca Sustainable Energy for NSR/PSD purposes because they do not provide at least 50% of the cellulosic biomass combusted by Seneca Sustainable Energy on an annual basis. The two facilities are considered one source for the purposes of determining whether the facilities are major sources of federal hazardous air pollutants (FHAP), as defined in LRAPA Title 12, because they are located on contiguous or adjacent properties and are owned or operated by the same person or by persons under common control.

Reasons for Permit Action and Fee Basis

6. 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 a permit. The facility has applied for the renewal of a Standard ACDP. The renewed Standard ACDP will be valid for five years.

Attainment Status

7. The facility is located inside the Eugene Springfield Air Quality Management Area. The facility is located in an area that has been designated an attainment area for PM_{2.5}, NO₂, SO₂, Ozone, Pb and a maintenance area for CO and PM₁₀.

Permitting History

8. 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	--

Date Approved/Valid	Permit Action Type	Description
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

Emission Unit Description

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

EU ID	Emission Unit Description	Control Device Description	PCD ID
MH	Sawmill/Planing Mill Activities	Three (3) Baghouses and Five (5) Cyclones	EP-01 EP-02 EP-04 EP-05 EP-06 EP-07 EP-08 EP-12
Kilns	Six (6) Dry Kilns	None	None
Boiler-3	One (1) 50 MMBtu/hr (40,000 lb/hr steam) Natural Gas-Fired Boiler	None	None
Categorically Insignificant Activities			
CIA-1	Diesel-Fired 150kW Emergency Generator	None	None
CIA-2	On-Site Storage Tanks (Diesel and Gasoline)	None	None

General Emission Limitations

- 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.
- The facility is subject to the visible emission limitations under LRAPA 32-010(3). For sources, 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.

12. 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):
 - 12a. For sources installed, constructed, or modified before June 1, 1970 for which there are no representative compliance source test results, the particulate matter emission limit is: (i) 0.24 grains per dry standard cubic foot prior to December 31, 2019; and (ii) 0.15 grains per dry standard cubic foot on or after January 1, 2020;
 - 12b. 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
 - 12c. For sources installed, constructed, or modified after April 16, 2015, the particulate matter emission limit is 0.10 grains per dry standard cubic foot.
13. Boiler-3 is subject to particulate matter emission limitations under LRAPA 32-030(2). This 50 MMBtu per hour natural gas-fired boiler was installed in 2016. For sources installed, constructed, or modified after April 16, 2015, the particulate matter emission limit is 0.10 grains per dry standard cubic foot.
14. The facility is 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.
15. 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.
16. 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)

17. LRAPA 32-008 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 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.
 - 17a. The Sawmill/Planing Mill Activities exhaust to cyclones or cyclones and baghouses in series to control particulate matter. These control devices are considered TACT for these processes.

- 17b. The dry kilns emit more than 10 tons of gaseous pollutants (VOC) and are therefore, required to meet TACT. LRAPA has determined that there are no control technologies typically achieved for dry kilns. TACT is considered to be current operations.
- 17c. Boiler-3 is a natural gas-fired boiler. Natural gas is considered a clean burning fuel. Boilers of this size do not usually have additional add-on controls. This boiler is considered to meet TACT.

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

- 18. Because the proposed PSELS for all regulated pollutants are below the major source threshold of 250 TPY and the PM₁₀ PSEL is below the Significant Emission Rates (SER) in LRAPA Title 38, the facility is not subject to Prevention of Significant Deterioration (PSD) requirements or LRAPA's New Source Review (NSR) requirements for PM₁₀, as applicable.

Plant Site Emission Limits (PSELS)

- 19. Provided below is a summary of the baseline emissions rate, netting basis, plant site emission limit, and emissions capacity.

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	49	51
PM ₁₀	13	21	13	21	27	35	45
PM _{2.5}	NA	NA	8	13	16	21	30
CO	2	2	2	2	99	99	8
NO _x	9	9	9	9	48	39	8
SO ₂	14	14	14	14	53	39	1
VOC	10	10	10	10	99	99	105
GHG	0	0	0	0	74,000	74,000	25,700

- 19a. The facility baseline emission rates for PM, PM₁₀, SO₂, NO_x, CO, and VOC were established for the ACDP issued on 01/26/1996. The VOC baseline emission rate was revised for 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) 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). The facility has no baseline for GHGs because the facility conservatively assumed they did not emit any GHGs during the baseline period established under the ACDP issued on 04/07/2015.
- 19b. The netting basis for PM, SO₂, NO_x, CO, and VOC 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 PM₁₀ PSEL to the PM_{2.5} 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 which results in a ratio of the PM₁₀ PSEL to the PM_{2.5} PSEL of approximately 0.59. There is no netting basis for GHGs because the facility has no baseline emission rate and has not had any emission increases approved under Title 38 for this pollutant.

- 19c. The PSELs 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). As part of this renewal, the PSELs for NO_x and SO₂ have been reset to the generic PSEL level as a result of permitting Boiler-3 to combust only natural gas.

Unassigned Emissions and Emission Reduction Credits

20. 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	Unassigned Emissions (TPY)	Emission Reduction Credits (TPY)	SER (TPY)
PM	0	0	25
PM ₁₀	0	0	15
PM _{2.5}	0	0	10
CO	0	0	100
NO _x	1	0	40
SO ₂	13	0	40
VOC	0	0	40
GHGs	0	0	75,000

Significant Emission Rate

21. 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. The increase above the SER for VOCs was previously evaluated as part of the review for the renewal issued on 04/07/2015. As such, no further analysis is required for any of these pollutants.

Pollutant	PSEL Increase Over Netting Basis (TPY)	Increase Due to Utilizing Capacity That Existed In The Baseline Period (TPY)	Increase Due to Physical Changes or Changes In The Method of Operation (TPY)	SER (TPY)
PM	24	0	0	25
PM ₁₀	14	0	0	15
PM _{2.5}	8	0	0	10
CO	97	0	0	100
NO _x	30	0	0	40
SO ₂	25	0	0	40
VOC	89	0	0	40
GHGs	74,000	0	0	75,000

Federal Hazardous Air Pollutants/Toxic Air Contaminants

22. Seneca Sawmill is considered 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 Seneca Sawmill Company (207459) and Seneca Sustainable Energy (206470). Seneca Sawmill and Seneca Sustainable

Energy are considered a single source for purposes of FHAP major source thresholds. The emission totals in the table below reflect the potential FHAP emissions from Seneca Sawmill, the potential FHAP emissions from Seneca Sustainable Energy, and the potential FHAP emissions from the combined facilities. Without the FHAP PSEL limitations, the combined facilities would be a major source of FHAPs because the individual FHAP potential emission of 16.7 TPY from acetaldehyde and the potential emissions of the aggregate of all FHAPs of 40.6 TPY is greater than the major source thresholds of 10 tons per year for an individual FHAP and 25 tons per year for the aggregate of all FHAPs. The FHAP emissions from the dry kilns at Seneca Sawmill are based on the permit requirement that the maximum temperature of each dry kiln not exceed 200 degrees Fahrenheit.

23. 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.

FHAP/Toxic Air Contaminant	Seneca Sustainable Energy Potential Emissions (TPY)	Seneca Sawmill Potential Emissions (TPY)	Combined Potential Emissions (TPY)
Metals			
Antimony	6.5E-04	--	6.5E-04
Arsenic	1.5E-03	4.3E-05	1.6E-03
Barium (TAC only)	0.25	--	0.25
Beryllium	2.9E-03	2.6E-06	2.9E-03
Cadmium	2.9E-03	2.4E-04	3.2E-03
Chromium VI (TAC)	7.6E-04	8.6E-07	7.6E-04
Chromium - Total	9.3E-04	3.0E-04	1.2E-03
Cobalt	2.9E-04	--	2.9E-04
Copper (TAC only)	8.5E-03	--	8.5E-03
Lead	9.0E-03	--	9.0E-03
Manganese	0.23	8.2E-05	0.23
Mercury	1.5E-03	5.6E-05	1.6E-03
Nickel	4.5E-03	4.5E-04	4.9E-03
Phosphorus	0.15	--	0.15
Selenium	4.6E-03	5.2E-06	4.6E-03
Silver (TAC only)	1.5E-03	--	1.5E-03
Thallium (TAC only)	2.9E-03	--	2.9E-03
Vanadium (TAC only)	9.1E-04	--	9.1E-04
Zinc (TAC only)	7.0E-02	--	7.0E-02
Inorganic Gases			
Ammonia (TAC only)	10.7	--	10.7
Chlorine	1.13	--	1.13

FHAP/Toxic Air Contaminant	Seneca Sustainable Energy Potential Emissions (TPY)	Seneca Sawmill Potential Emissions (TPY)	Combined Potential Emissions (TPY)
Hydrogen Chloride	1.46	--	1.46
Organics			
POM or PAH	4.6E-02	8.6E-05	4.6E-02
Acetaldehyde	0.51	16.2	16.7
Acetone (TAC only)	0.34	--	0.34
Acetophenone	4.0E-04	--	4.0E-04
Acrolein	0.16	0.20	0.36
Benzene	5.10	1.2E-03	5.10
Bis(2-Ethylhexyl)phthalate	7.3E-05	--	7.3E-05
Bromodichloromethane (TAC only)	4.64	--	4.64
Bromomethane (TAC only)	2.3E-02	--	2.3E-02
Butyl benzyl phthalate (TAC only)	2.0E-02	--	2.0E-02
Carbon disulfide	0.20	--	0.20
Carbon tetrachloride	1.4E-03	--	1.4E-03
Chlorobenzene	2.6E-02	--	2.6E-02
Chloroform	4.8E-02	--	4.8E-02
Chloromethane (TAC only)	6.2E-02	--	6.2E-02
2-Chlorophenol (TAC only)	7.9E-05	--	7.9E-05
Crotonaldehyde (TAC only)	1.7E-02	--	1.7E-02
Cumene	2.8E-02	--	2.8E-02
Dibenzofurans	1.2E-06	--	1.2E-06
Dibutyl phthalate	5.1E-02	--	5.1E-02
1,2-Dichloropropane (TAC only)	5.1E-02	--	5.1E-02
Diethyl phthalate (TAC only)	6.8E-02	--	6.8E-02
4,6-Dinitro-o-cresol	3.2E-03	--	3.2E-03
2,4-Dinitrophenol	7.4E-04	--	7.4E-04
2,4-Dinitrotoluene	1.5E-03	--	1.5E-03
Dioxins/Furans as TEQ (TAC only)	4.9E-04	--	4.9E-04
Ethylbenzene	1.1E-02	1.5E-03	1.2E-02
Formaldehyde	0.16	0.18	0.34
Hexachlorobenzene	1.5E-03	--	1.5E-03
n-Hexane	0.45	9.9E-04	0.45
Isopropanol (TAC only)	6.03	--	6.03
Methanol	1.28	10.9	12.2
Methyl Isobutyl Ketone	3.6E-02	--	3.6E-02
Methylene Chloride	0.83	--	0.83
Naphthalene	0.25	6.4E-05	0.25
4-Nitrophenol	5.1E-04	--	5.1E-04
PCBs (Total)	8.6E-06	--	8.6E-06
Pentachlorophenol	7.1E-05	--	7.1E-05
Phenol	2.2E-02	--	2.2E-02
Propylene (TAC only)	--	0.11	0.11
Propionaldehyde	9.4E-02	0.16	0.25
Styrene	6.1E-03	--	6.1E-03

FHAP/Toxic Air Contaminant	Seneca Sustainable Energy Potential Emissions (TPY)	Seneca Sawmill Potential Emissions (TPY)	Combined Potential Emissions (TPY)
2,3,7,8-TCDD	7.3E-07	--	7.3E-07
Tetrachloroethene	8.0E-02	--	8.0E-02
Toluene	1.1E-02	5.7E-03	1.7E-02
1,2,4-Trichlorobenzene	8.5E-02	--	8.5E-02
1,1,1-Trichloroethane	9.9E-02	--	9.9E-02
1,1,2-Trichloroethane	0.19	--	0.19
Trichloroethene	4.3E-02	--	4.3E-02
Trichlorofluoromethane (TAC only)	6.3E-02	--	6.3E-02
2,4,6-Trichlorophenol	3.4E-04	--	3.4E-04
Vinyl chloride	2.8E-02	--	2.8E-02
Xylenes	0.10	4.2E-03	0.11
Aggregate of FHAPs =			40.6

National Emission Standards for Hazardous Air Pollutants (NESHAPs)

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

24. This facility is an area source of FHAPs. The facility includes on-site storage tanks (diesel and gasoline) that are included under CIA-2 that were installed in the 1980's. 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 40 CFR Part 63 Subpart CCCCCC – National Emission Standards of Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities. Under the regulation, the GDF is considered an existing GDF. The maximum amount of gasoline dispensed at the GDF is approximately 31,500 gallons per month.
25. 40 CFR 63 Subpart CCCCCC has not been adopted by LRAPA. Under LRAPA 37-066(3)(a), Standard ACDPs exclude federal requirements not adopted by the LRAPA Board of Directors. The 40 CFR 63 Subpart CCCCCC requirements that are applicable to the existing GDF at the facility are identified in the following table:

40 CFR 63 Subpart 6C Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
63.11110	Purpose	Yes	None	--
63.11111	Applicability	Yes	The facility is a GDF and has a monthly throughput of more than 10,000 gallons per month.	--
63.11112	Emission sources covered	Yes	None	--
63.11113	Compliance dates	Yes	The compliance date for an existing source is no later than January 10, 2008.	--
63.11115	General duties	Yes	None	--
63.11116	Requirements: <10,000 gallons per month	Yes	None	--

40 CFR 63 Subpart 6C Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
63.11117	Requirements: \geq 10,000 gallons per month	Yes	None	--
63.11118	Requirements: \geq 100,000 gallons per month	No	None	--
63.11120	Testing and monitoring	No	None	--
63.11124	Notifications	Yes	None	--
63.11125	Recordkeeping	Yes	Keep records of malfunctions as listed under 40 CFR 63.11125(d)	--
63.11126	Reporting	Yes	Report any malfunctions.	--
63.11130	General provisions	Yes	None	--
63.11131	Implementation and enforcement	Yes	None	--
63.11132	Definitions	Yes	None	--

40 CFR Part 63 Subpart JJJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

26. This facility is an area source of FHAPs. As such, Boiler-3 is potentially subject to the requirements under 40 CFR 63 subpart JJJJJJ (6J) which were promulgated on March 21, 2011. However, Boiler-3 meets the definition of a gas-fired boiler under 40 CFR 63.11237. Under 40 CFR 11195(e), a gas-fired boiler is not subject to this NESHAP.

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

27. 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)(1), a new or reconstructed stationary RICE located at an area source of FHAPs 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 such engines under 40 CFR 63 subpart ZZZZ.

New Source Performance Standards (NSPSs)

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

28. 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 has a maximum heat input capacity of 50 MMBtu per hour and is subject to this regulation.
29. The 40 CFR 60 Subpart Dc requirements that are applicable to Boiler-3 at the facility 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	Boiler has a maximum heat input capacity between 10 and 100 MMBtu per hour.	NA
60.41c	Definitions	Yes	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 the boiler.	19

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

30. 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.
31. 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).
32. 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 definition of an emergency generator in the definition of “Categorically Insignificant Activity” LRAPA Title 12, Category UU does not allow an emergency

generator to be used in this manner. There is no time limit on the use of emergency stationary ICE in emergency situations.

33. 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 Envntl. 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.
34. 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	Subpart applicability	Yes	None.	NA
60.4201	Emission standards	No	For non-emergency engines.	NA
60.4202	Subpart 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.	21
60.4203	Emission standards	No	Manufacturer requirements.	NA
60.4204	Emission standards	No	Emission standards for non-emergency engines.	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.	21
60.4206	Emission standards	Yes	The emission standards are applicable for the life of the engine.	22
60.4207	Fuel requirements	Yes	Must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel.	23
60.4208	Requirements	No	Limitations on installation of previous model years engines	NA
60.4209	Monitoring requirements	Yes	Installation of a non-resettable hour meter.	24
60.4210	Compliance requirements	No	Manufacturer compliance requirements.	NA
60.4211	Compliance requirements	Yes	Recordkeeping requirements.	25
60.4212	Testing requirements	No	No testing requirements applicable to emergency engines.	NA
60.4213	Testing Methods	No	No testing requirements applicable to emergency engines.	NA

40 CFR 60 Subpart IIII Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
60.4214	Notification, reporting, and recordkeeping requirements	Yes	Not applicable because the emission unit is not subject to sulfur dioxide standards.	26
60.4215	Special requirements.	No	Engine is not located in the listed geographic areas.	NA
60.4216	Special requirements	No	Engine is not located in the listed geographic areas.	NA
60.4217	Special requirements	No	Engine does not use special fuels.	NA
60.4218	General provisions	Yes	None.	NA
60.4219	Definitions	Yes	None.	NA

Compliance History

35. 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
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

36. LRAPA has issued the following violation notices and/or taken the following enforcement actions against this facility:

- 36a. 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.
- 36b. 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.
- 36c. 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.
- 36d. 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
- 36e. 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.
- 36f. 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

- 37. 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

- 38. 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
Operation and Maintenance Plan	NA	Maintain the current version on-site

Activity	Units	Minimum Recording Frequency
NSPS Dc Recordkeeping		
Initial notification for NSPS Dc	NA	One time
Natural gas combusted	MMSCF	Monthly
NSPS IIII Recordkeeping		
Diesel fuel supplier certifications	NA	Each delivery
The date and time of operation of CIA-1	Date, Hours of operation	Each occurrence
Reason for operation of CIA-1	NA	Each occurrence
The amount of time that CIA-1 operates for non-emergency reasons in a calendar year	Hours	Monthly
Title 44 Recordkeeping		
Initial notification	NA	One time
The monthly gasoline throughput of the GDF	Gallons	Monthly
The annual gasoline throughput of the GDF in any 12 consecutive months	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

39. 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	Annual	February 15
The excess emission log information required by Condition G.13, if required by G.13.	Annual	March 1
Annual emissions as calculated according to Conditions Error! Reference source not found. , Error! Reference source not found. and Error! Reference source not found. , including the supporting process parameter and emission factor information	Annual	March 1
GHG Report	Annual	March 31

40. 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

41. This draft permit will be on public notice from November 1, 2019 to December 5, 2019. Written comments may be submitted during the 35-day comment period. If requested by ten (10) or more individuals or an individual representing a group of more than ten (10) individuals, there will be a public hearing following the comment period.

After the comment period and hearing (if requested), LRAPA will respond to comments received and then take final action to issue or deny the permit within 45 days of the close of the public

Seneca Sawmill Company
Permit No. 207459
Expiration Date: [5 years from issuance]

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Review Report

comment or hearing period.

JJW/CMW
10/24/2019

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	49	0	24	51	25
PM ₁₀	13	21	13	21	27	35	0	14	45	15
PM _{2.5}	NA	NA	8	13	16	21	0	8	27	10
CO	2	2	2	2	99	99	0	97	8	100
NO _x	9	9	9	9	48	39	1	30	8	40
SO ₂	14	14	14	14	53	39	14	25	0.4	40
VOC	10	10	10	10	99	99	0	89	105	40
GHG (CO ₂ eq.)	0	0	0	0	74,000	74,000	0	74,000	25,644	75,000
Individual FHAP	NA	NA	NA	NA	9	9	NA	NA	16	NA
Aggregate FHAP	NA	NA	NA	NA	24	24	NA	NA	28	NA

Notes:

Facility is subject to a combined FHAP limitation with SSE (207459) of 9 TPY for an individual FHAP and 24 TPY for the aggregate of FHAPs

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 Boiler	0.54	0.54	0.54	8.10	7.88	0.37	1.18	25,644
Kilns	Six (6) Dry Kilns	6.75	6.75	6.75	NA	NA	NA	104	NA
MH	Sawmill/Planing Mill Activities	44.1	37.9	20.1	NA	NA	NA	NA	NA
Total =		51	45	27	8	8	0.4	105	25,644

CAS Number	Pollutant	TPY	Federal	CAO
			HAP	Toxic
Organics				
75-07-0	Acetaldehyde	16.2	Yes	Yes
107-02-8	Acrolein	0.20	Yes	Yes
71-43-2	Benzene	1.2E-03	Yes	Yes
108-90-7	Chlorobenzene	0.0E+00	Yes	Yes
100-41-4	Ethyl Benzene	1.5E-03	Yes	Yes
50-00-0	Formaldehyde	0.18	Yes	Yes
110-54-3	Hexane	9.9E-04	Yes	Yes
67-56-1	Methanol	10.9	Yes	Yes
91-20-3	Naphthalene	6.4E-05	Yes	Yes
NA	POM (inc. PAHs)	8.6E-05	Yes	Yes
123-38-6	Propionaldehyde	0.16	Yes	Yes
115-07-1	Propylene	0.11	No	Yes
108-88-3	Toluene	5.7E-03	Yes	Yes
1330-20-7	Xylenes	4.2E-03	Yes	Yes
Acid Gases				
7647-01-0	Hydrogen Chloride	0.0E+00	Yes	Yes
Metals				
7440-38-2	Arsenic	4.3E-05	Yes	Yes
7440-41-7	Beryllium	2.6E-06	Yes	Yes
7440-43-9	Cadmium	2.4E-04	Yes	Yes
7440-47-3	Total Chromium	3.0E-04	Yes	No
18540-29-9	Hexavalent Chromium	0.0E+00	Yes*	Yes
7439-92-1	Lead Cmpds	0.0E+00	Yes	Yes
7439-96-5	Manganese	8.2E-05	Yes	Yes

CAS Number	Pollutant	TPY	Federal	CAO
			HAP	Toxic
7439-97-6	Mercury	5.6E-05	Yes	Yes
7440-02-0	Nickel	4.5E-04	Yes	Yes
7782-49-2	Selenium	5.2E-06	Yes	Yes
Total FHAPs =		27.7		
Max Individual FHAP =		16.2	Acetaldehyde	

*Note: For total FHAPs calculations, hexavalent chromium is assumed to be included in total chromium

Seneca Sawmill Company - 207459
Emission Detail
Sheets
Boiler-3 Emission Calculations

Boiler Specifications

Max Heat Input	50	MMBtu/hr
Heat Value - NG	1020	MMBtu/MMCF
Heat Value - FO	140000	Btu/gal
Max Hrs Operation - NG	8760	hr/yr
Max Hrs Operation - FO	0	hr/yr

Criteria Pollutants

Pollutant	NG Emission Factor (lb/MMCF)	NG Emission Factor Units	FO Emission Factor (lb/MGAL)	FO Emission Factor Units	Potential Hourly Emissions (lbs/hr)	Potential Annual Emissions (TPY)
PM/PM10/PM2.5	2.5	lbs/MMCF	0	lbs/MGAL	0.12	0.54
Carbon Monoxide	0.037	lbs/MMBtu	0.000	lbs/MMBtu	1.85	8.10
Nitrogen Oxides	0.036	lbs/MMBtu	0.000	lbs/MMBtu	1.80	7.88
Sulfur Dioxide	1.7	lbs/MMCF	0	lbs/MGAL	0.08	0.37
VOCs	5.5	lbs/MMCF	0.0	lbs/MGAL	0.27	1.18
GHGs (CO2 equiv.)	117	lbs/MMBtu	0	lbs/MMBtu	5,855	25,644

FHAP Emissions

Pollutant	NG Emission Factor (lb/MMCF)	FO Emission Factor (lb/MGAL)	Potential Hourly Emissions (lbs/hr)	Potential Annual Emissions (TPY)
Organics				
Acetaldehyde	0.0031	0.0000	1.5E-04	6.7E-04
Acrolein	0.0027	0.0000	1.3E-04	5.8E-04
Benzene	0.0058	0.0000	2.8E-04	1.2E-03
Chlorobenzene		0.0000	0.0E+00	0.0E+00
Ethyl Benzene	0.0069	0.0000	3.4E-04	1.5E-03
Formaldehyde	0.0123	0.0000	6.0E-04	2.6E-03
Hexane	0.0046	0.0000	2.3E-04	9.9E-04
Hydrogen Chloride		0.0000	0.0E+00	0.0E+00
Naphthalene	0.0003	0.0000	1.5E-05	6.4E-05
POM (inc. PAHs)	0.0004	0.0000	2.0E-05	8.6E-05
Propylene	0.5300	0.0000	2.6E-02	1.1E-01
Toluene	0.0265	0.0000	1.3E-03	5.7E-03
Xylenes	0.0197	0.0000	9.7E-04	4.2E-03
Metals				
Arsenic	2.0E-04	0.0000	9.8E-06	4.3E-05
Beryllium	1.2E-05	0.0000	5.9E-07	2.6E-06
Cadmium	1.1E-03	0.0000	5.4E-05	2.4E-04

Pollutant	NG Emission Factor (lb/MMCF)	FO Emission Factor (lb/MGAL)	Potential Hourly Emissions (lbs/hr)	Potential Annual Emissions (TPY)
Total Chromium	1.4E-03	0.0000	6.9E-05	3.0E-04
Hexavalent Chromium	0.0000	0.0000	0.0E+00	0.0E+00
Lead Cmpds		0.0000	0.0E+00	0.0E+00
Manganese	3.8E-04	0.0000	1.9E-05	8.2E-05
Mercury	2.6E-04	0.0000	1.3E-05	5.6E-05
Nickel	2.1E-03	0.0000	1.0E-04	4.5E-04
Selenium	2.4E-05	0.0000	1.2E-06	5.2E-06
Total =	0.62	0.00		0.13

GHG-Related Emission Factors

Pollutant	Natural Gas (kg/MMBtu)	Fuel Oil (kg/MMBtu)	GWP
Carbon Dioxide (CO ₂)	53.06	73.96	1
Methane (CH ₄)	1.0E-03	3.0E-03	25
Nitrous Oxide (N ₂ O)	1.0E-04	6.0E-04	298

Notes:

Potential hourly criteria pollutant and FHAP emission rates are based upon the fuel with the highest emitting hourly rate for a given pollutant.

Potential annual criteria pollutant and FHAP emission rates are based upon the fuel combination resulting in the highest annual rate for a given pollutant.

Facility has restricted Boiler-3 operations on fuel oil so that the boiler meets the definition of a natural gas boiler under 40 CFR 63 subpart 6J.

FHAP emission factors, except for metals from NG combustion, are from Ventura County APCD "AB 2588 Combustion Emission Factors".

FHAP emission factors for metals from NG combustion are from US EPA AP-42 Section 1.4 - Natural Gas Combustion (07/1998)

Seneca Sawmill Company - 207459

Emission Detail Sheets

Dry Kilns

Max. Kiln Production 270,000 MBF/yr

Criteria Pollutants

Pollutant	Emission Factor (lb/MBF)	100% Douglas Fir		100% Hemlock Fir			Kiln PTE	
		Potential Emissions (lbs/hr)	Potential Emissions (TPY)	Emission Factor (lb/MBF)	Potential Emissions (lbs/hr)	Potential Emissions (TPY)	Potential Emissions (lbs/hr)	Potential Emissions (TPY)
VOC	0.768	23.7	104	0.38	11.7	51.3	23.7	104
PM/PM10/PM2.5	0.020	0.62	2.70	0.05	1.54	6.75	1.54	6.75

FHAPs

Pollutant	Emission Factor (lb/MBF)	100% Douglas Fir		100% Hemlock Fir			Kiln PTE	
		Potential Emissions (lbs/hr)	Potential Emissions (TPY)	Emission Factor (lb/MBF)	Potential Emissions (lbs/hr)	Potential Emissions (TPY)	Potential Emissions (lbs/hr)	Potential Emissions (TPY)
Acetaldehyde	0.051	1.57	6.89	0.12	3.70	16.2	3.70	16.2
Acrolein	0.0007	0.02	0.09	0.0015	0.05	0.20	0.05	0.20
Formaldehyde	0.0013	0.04	0.18	0.0013	0.04	0.18	0.04	0.18
Methanol	0.0389	1.20	5.25	0.0809	2.49	10.9	2.49	10.9
Propionaldehyde	0.0005	0.02	0.07	0.0012	0.04	0.16	0.04	0.16

Total = 0.0924

0.2049

Notes:

Emission factors are from the "2015 Compilation of VOC and HAP Emission Factors for Lumber Drying Kilns - ODEQ and EPA R10"
 Based on maximum kiln temperature below 200oF

Seneca Sawmill Company - 207459
Emission Detail
Sheets
Sawmill/Planing Mill Activities

Emission Point	Old ACDP ID	Emission Point Description	Pollutant	Max Annual Throughput (BDT/year)	Emission Factor (lbs/BDT)	PM Potential Emissions (TPY)	PM10 Potential Emissions (TPY)	PM2.5 Potential Emissions (TPY)
EP-01	BH-1	Main Baghouse	PM/PM10/PM2.5	250,000	0.001	0.13	0.13	0.13
EP-02	BH-2A	Mill A Planer Baghouse No. 1	PM/PM10/PM2.5	175,000	0.001	0.09	0.09	0.09
--	BH-2B	Mill A Planer Baghouse No. 2	PM/PM10/PM2.5	175,000	0.001	0.09	0.09	0.09
EP-04	C-3	Planer Knife Grinding Cyclone*	PM/PM10/PM2.5	Unknown	--	--	--	--
EP-05	C-1	Stud Mill Sawdust Cyclone	PM	80,000	0.5	20.0	--	--
EP-05	C-1	Stud Mill Sawdust Cyclone	PM10	80,000	0.43	--	17.2	--
EP-05	C-1	Stud Mill Sawdust Cyclone	PM2.5	80,000	0.25	--	--	10.00
EP-06	BH-3	Stud Mill Planer Shavings Baghouse	PM/PM10/PM2.5	80,000	0.001	4.0E-02	4.0E-02	4.0E-02
EP-07	C-4	Mill A Grinder Cyclone*	PM/PM10/PM2.5	Unknown	--	--	--	--
EP-08	C-2	Mill A Sawdust Cyclone	PM	65,000	0.5	16.3	--	--
EP-08	C-2	Mill A Sawdust Cyclone	PM10	65,000	0.43	--	13.98	--
EP-08	C-2	Mill A Sawdust Cyclone	PM2.5	65,000	0.25	--	--	8.13
EP-11	--	Rail Chip Bin Target Box	PM	150,000	0.1	7.50	--	--
EP-11	--	Rail Chip Bin Target Box	PM10	150,000	0.085	--	6.38	--
EP-11	--	Rail Chip Bin Target Box	PM2.5	65,000	0.05	--	--	1.63
EP-12	C-5	Merchandiser Filing Room Grinder Cyclone*	PM/PM10/PM2.5	Unknown	--	--	--	--
Total						44.1	37.9	20.1

Notes:

* Controls metal grinding, assumed to be minimal

Emission factors for controlled wood-related activities are from DEQ Sawmill General Permit AQGP-010. Cyclone emission factors assume medium efficiency cyclones.

Mill A planer chipper cyclone (EP-03) vents to Mill A planer baghouse (EP-02) and is no longer an emission point

Mill A edger cyclone (EP-10) has been dismantled and removed from the facility

The facility is permitted to install Mill A Planer Baghouse No. 2, but has not plans for construction in the near future

Seneca Sawmill Company - 207459
Emission Detail Sheets
Baseline/Netting Basis Adjustment

	1977 or 1978 Thruput (BDT)	PM Emission Factor (lb/BDT)	Original Baseline				Revised Baseline					
			PM Baseline (TPY)	PM ₁₀ Emission Factor (lb/BDT)	PM ₁₀ Baseline (TPY)	PM _{2.5} Baseline (TPY)	PM Emission Factor (lb/BDT)	PM Baseline (TPY)	PM ₁₀ Emission Factor (lb/BDT)	PM ₁₀ Baseline (TPY)	PM _{2.5} Emission Factor (lb/BDT)	PM _{2.5} Baseline (TPY)
<i>Seneca Sawmill</i>												
<i>Mill A</i>												
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
<i>Mill B</i>												
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
<i>Tree Products</i>												
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

Note:

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 PM₁₀ 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 PM₁₀.

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.

Revised baseline based on DEQ emission factors assumes a ratio of approximately 0.59 for PM_{2.5} to PM₁₀.