Lane Regional Air Protection Agency
Standard Air Contaminant Discharge Permit

Review Report

Seneca Sawmill Company **Permit No. 207459**
90201 Highway 99N
Eugene, Oregon 97402
Website: https://senecasawmill.com/

Source Information:

Primary SIC	2421 - Sawmill/Planing Mill
Secondary SIC	--
Primary NAICS	321113 - Sawmills
Secondary NAICS	--
Source Categories	B:62. – Sawmills and/or

(LRAPA title 37, Table 1)	planing mills 25,000 or more board feet/maximum 8 hour finished product
Public Notice Category	IV

Compliance and Emissions Monitoring Requirements:

Unassigned Emissions	Y
Emission Credits	N
Compliance Schedule	N
Source Test [date(s)]	N

COMS	N
CEMS	N
Ambient monitoring	N

Reporting Requirements

Annual Report (due date)	March 1
Semi-Annual Report (due date)	September 1
GHG Report (due date)	March 31
Monthly Report (due date)	N

Quarterly Report (due date)	N
Excess Emissions Report	Y
Other Reports (due date) - LRAPA title 44 Report	February 15

Air Programs

NSPS (list subparts)	Dc, IIII
NESHAP (list subparts)	A, ZZZZ, DDDD, DDDDD
CAM	N
Regional Haze (RH)	N
Synthetic Minor (SM)	N
SM-80	N
Title V	Y
Part 68 Risk Management	N
ACDP (SIP)	N
Major FHAP Source	Y
Federal Major Source	N
NA New Source Review (NSR)	N
Prevention of Significant Deterioration (PSD)	N
Acid Rain	N
Clean Air Mercury Rule (CAMR)	N
TACT	N
>20 Megawatts	N

Permittee Identification

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

General Background

2. SSC is proposing to expand the capacity of the facility. Currently the facility has a capacity of 270 million board feet of lumber. The facility is proposing to increase capacity to 540 million board feet of lumber. They are also proposing to add two (2) additional dry kilns, for a total of ten dry kilns and add two (2) additional 50 MMBtu per hour natural gas-fired boilers, for a total of three (3) 50 MMBtu per hour natural gas-fired boilers. The facility does not anticipate changing any of the control equipment related to the sawmill and planing mill activities. Currently the facility uses up to six (6) baghouses and one (1) target box with filter to control particulate matter emissions from sawmill and planing mill activities. This expansion is considered a Type 4 change under LRAPA 34-035.

3. The facility was acquired by Sierra Pacific Industries (SPI), a forest products company based in Anderson, California, in 2021. SPI owns and manages more than 2.3 million acres of timberland in California, Oregon and Washington and is one of the largest U.S. lumber manufacturers. SPI has stated they intend to retain the current name of the facility.

4. The facility 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. SSC purchased this facility in April 1993. LRAPA subsequently merged the two (2) facilities under the Seneca Sawmill permit identification number. The baselines for the two (2) facilities were also merged.

5. SSC is contiguous with Seneca Sustainable Energy ("SSE" – Permit No. 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 business activities do not belong to the same two-digit SIC code. Also, LRAPA has previously determined that SSC is not a support facility for SSE because SSC does not provide at least 50% of the cellulosic biomass combusted by SSE on an annual basis.

6. SSC and SSE are considered one source for the purposes of determining whether the facilities are a major source of federal hazardous air pollutants (FHAP), as defined in LRAPA title 12, because they are located within a contiguous area and are under common control. As part of this permitting review, SSC has applied to become a major source of FHAP. Because SSC will be a major source of FHAP, SSE will also become a major source of FHAP.

7. Because the proposed modifications at SSC will increase potential VOC emissions above 100 TPY and the facility will become a major source of FHAP, SSC will be considered a Title V source. Upon issuance of the Standard ACDP, the facility will have up to 12 months to apply for a Title V permit.

Reasons for Permit Action and Fee Basis

8. 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 an air contaminant discharge permit. The current Standard ACDP for the facility expired on April 7, 2020. The facility submitted a renewal application on October 1, 2019. Because the facility submitted a timely renewal application at least 6 months prior to the expiration of the Standard ACDP, they are authorized to continue operating until the Standard ACDP is renewed. In the Spring of 2020, LRAPA provided public notice of a draft renewal Standard ACDP, received public comments, and the request for a public hearing. Due to Covid-19, the public hearing was cancelled, and the renewal process was paused. LRAPA intends to restart the public notice

process. The renewed Standard ACDP will be valid for up to five (5) years or until a Title V permit is issued for this facility.

9. The Standard ACDP renewal also includes a Type 4 change under LRAPA 34-035 as discussed in this review report.

Attainment Status

10. The facility is located inside the Eugene-Springfield Air Quality Management Area. The facility is located in an area that has been designated attainment/unclassified for $PM_{2.5}$, ozone (VOC), NO_2, SO_2, and Pb and a maintenance area for CO and PM_{10}. The facility is located within 100 kilometers of two (2) Class I air quality protection areas: Diamond Peak Wilderness and Three Sisters Wilderness area.

Permitting History

11. 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	--
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
09/30/2020	NC-207459-A20	Approval to Construct two (2) dry kilns
10/26/2020	ACDP Addendum No. 1	Add two (2) dry kilns
01/04/2021	NC-207459-B20	Approval to Construct two (2) baghouses to control emissions from EP-05 at Stud Mill and EP-08 at Mill A
Upon Issuance	ACDP	Renewal and Type 4 change due to facility expansion and boiler installation.

Emission Unit Descriptions

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

EU ID	Emission Unit Description	PCD ID	Pollution Control Device Description
Mills	Sawmill/Planing Mill Activities	EP-01 EP-02A EP-02B EP-05 EP-06	Main Baghouse Mill A Planer Baghouse No. 1 Mill A Planer Baghouse No. 2 Stud Mill Sawdust Baghouse

EU ID	Emission Unit Description	PCD ID	Pollution Control Device Description
		EP-08 EP-11	Stud Mill Planer Shaving Baghouse Mill A Sawdust Baghouse One (1) Target Box with Filter
Kilns	10 Dry Kilns	None	None
Boiler-3	One (1) 50 MMBtu/hr Natural Gas-Fired Boiler	None	None
Boiler-4	One (1) 50 MMBtu/hr Natural Gas-Fired Boiler	None	None
Boiler-5	One (1) 50 MMBtu/hr Natural Gas-Fired Boiler	None	None
GDF	Gasoline Dispensing Facility	None	None
Categorically Insignificant Activities			
CIA-1	Diesel-Fired 150 kW Emergency Generator	None	None
CIA-2	On-Site Storage Tanks (Diesel and Gasoline)	None	None

13. Sawmill/Planing Mill Activities (Mills)
The board cutting and planing activities generate particulate matter in the form of wood dust and shavings. The particulate matter emissions from these processes are ultimately controlled by up to six (6) baghouses and one (1) target box with filter. The criteria pollutant emissions from these sources are based on emission factors from Table 13.2 of the DEQ General ACDP for sawmills, planning mills, millwork, plywood manufacturing, and/or veneer drying (AQGP-010 expiring 10/01/2027). These sources are not expected to have any significant FHAP or CAO TAC emissions.

14. 10 Dry Kilns
The facility currently uses eight (8) dry kilns to dry dimensional lumber. As part of the proposed facility expansion, the facility has requested the authority to install two (2) additional dry kilns for a total of 10 dry kilns. The steam for the dry kilns is primarily provided by SSE. The facility will use the existing and proposed boilers to generate steam on-site when SSE is not operational. The criteria, FHAP and CAO TAC emissions from these sources are based on emission factors from DEQ AQ-EF09 – DEQ HAP and VOC Emission Factors for Lumber Drying, 2021.

15. One (1) 50 MMBtu/hr Natural Gas-Fired Boiler (Boiler-3)
One (1) 50 MMBtu/hr Natural Gas-Fired Boiler (Boiler-4)
One (1) 50 MMBtu/hr Natural Gas-Fired Boiler (Boiler-5)
The facility currently uses one (1) 50 MMBtu/hr boiler (Boiler-3) installed in 2016 to dry dimensional lumber if SSE is not operational. As part of the proposed facility expansion, the facility is requesting the authority to install two (2) additional natural gas-fired boilers rated at 50 MMBtu/hr each, to be known as Boiler-4 and Boiler-5. Each boiler is capable of generating 40,000 pounds per hour of steam. These boilers will be used to dry dimensional lumber if SSE is not operational. The facility has requested the removal of fuel oil backup capability on Boiler-3. Boiler-3 was originally permitted to use natural gas as the primary fuel and fuel oil backup in case of natural gas curtailment. However, the facility never constructed any physical connections to a fuel oil source for Boiler-3. The facility has requested that Boiler-3 be permitted to combust natural gas only. The criteria pollutant emissions from these sources are based on emission factors derived from DEQ AQ-EF05 – Emission Factors Gas Fired Boilers, US EPA 40 CFR 98, Tables C-1 and C-2, and manufacturer's guarantees. The FHAP or CAO TAC emissions from these sources are based on

emission factors from "AB 2588 Combustion Emission Factors" published by California's Ventura County APCD, US EPA AP-42, Section 1.4 – Natural Gas Combustion (07/1998), and US EPA WebFIRE.

16. One (1) Gasoline Dispensing Facility
The facility has one (1) 6,000 gallon gasoline tank and one (1) 2,000 gallon gasoline tank that are used to fuel company vehicles. These tanks represent one (1) gasoline dispensing facility (GDF). The criteria, FHAP and CAO TAC emissions from this source are based on emission factors developed by LRAPA that take in to account the percentage of vehicles in Lane County equipped with Onboard Refueling Vapor Recovery.

General Emission Limitations

17. 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.

18. The facility is subject to the visible emission limitations under LRAPA 32-010(3). For sources, other than wood-fired boilers, 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.

19. 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):
    19a. 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
    19b. For sources installed, constructed, or modified after April 16, 2015, the particulate matter emission limit is 0.10 grains per dry standard cubic foot.

20. Boiler-3, Boiler-4, and Boiler-5 are subject to particulate matter emission limitations under LRAPA 32-030(2). Boiler-3 was installed in 2016. Boiler-4 and Boiler-5 will be authorized for installation upon issuance of this permit. For sources installed, constructed, or modified after April 16, 2015, the particulate matter emission limit is 0.10 grains per dry standard cubic foot.

21. Sawmill/Planing Mill Activities and the 10 Dry Kilns are 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.

22. 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.

23. 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)

24. LRAPA 32-008(1) 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 LRAPA 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.

25. LRAPA 32-008(2) requires new or modified emission units to meet TACT if the emission unit meets the following criteria: The emission unit is not subject to Major NSR or Type A State NSR in LRAPA title 38, and applicable NSPS in LRAPA title 46, or any other standard applicable to only new or modified sources in LRAPA title 32, title 33, or title 39 for the regulated pollutant; the source is required to have a permit; if new, the emission unit has emissions of any criteria pollutant equal to or greater than one (1) ton per year of any criteria pollutant; if modified, the emission unit would have an increase in emissions of any criteria pollutant equal to or greater than one (1) ton per year of any criteria pollutant; and LRAPA determines that the proposed air pollution control devices and emission reduction processes do not represent TACT.

26. The Sawmill/Planing Mill Activities exhaust to six (6) baghouses and one (1) target box with filter. These control devices are considered TACT for these processes.

27. The dry kilns individually emit more than either the TACT thresholds under LRAPA 32-008(1)&(2) for VOC emissions. US EPA and LRAPA have determined that there are no control technologies currently used in practice or economically feasible for dry kilns. TACT is considered to be current operations.

28. Boiler-3, Boiler-4, and Boiler-5 will only combust natural gas and are or will be equipped with low NO_X burners that reduce NO_X and CO emissions. Boilers of this size do not usually have any additional add-on controls. These boilers are considered to meet TACT.

Plant Site Emission Limits (PSELs)

29. Provided below is a summary of the baseline emissions rate, netting basis, plant site emission limit, and potential-to-emit:

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	24	20
PM_{10}	13	21	13	21	27	24	19

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)	
$PM_{2.5}$	NA	NA	8	13	16	22	19
CO	2	2	2	2	99	99	24
NOx	9	9	9	9	48	39	24
SO_2	14	14	14	14	53	39	1.1
VOC	10	10	10	10	99	249	249
GHG	0	4,376	0	4,376	74,000	76,933	76,933

29a. The facility baseline emission rates for PM, PM_{10}, SO_2, NO_X, CO, and VOC were established in the ACDP issued on 01/26/1996. The VOC baseline emission rate was revised in 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 PM_{10} is proposed to be revised under this ACDP renewal as allowed under LRAPA 42-0048(6)(c) because the DEQ emission factors for PM_{10} 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). While DEQ changed the HAP and VOC emission factors for dry kilns in 2021, there is not enough historical information available to reset the VOC baseline.

29b. The facility did not previously request a baseline emission rate for GHGs under the ACDP issued on 04/07/2015. For GHGs, the baseline emission rate is any consecutive 12 calendar month period during calendar years 2000 through 2010. The facility has requested the use of calendar year 2007 to establish their baseline emission rate for GHGs in this Standard ACDP.

29c. The netting basis for PM, SO_2, NO_X, CO, VOC, and GHGs are the same as the baseline emission rates. The netting basis for PM_{10} 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 $PM_{2.5}$ PSEL to the PM_{10} PSEL (0.59) multiplied by the PM_{10} 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.

29d. The PSELs for this facility 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 PM_{10} 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) and established at a PSEL requested by the permittee as allowed under LRAPA 42-0041(2). The PSELs for PM, NO_X and SO_2 have been lowered to the generic PSEL level because under LRAPA 42-0041, sources with a potential to emit less than the SER will receive a source specific PSEL set equal to the generic PSEL level.

29e. The facility requested an increase in the VOC PSEL of 150 tons per year as part of the application submitted on October 15, 2021. Because this increase is considered a Type B State NSR action under LRAPA 38-0010(2)(d)(B), there will be no increase in the netting basis for VOCs. Because this increase in VOC emissions will exceed the netting basis by the SER, the facility must perform an air quality modeling analysis under LRAPA 40-0050(1)&(2) and 40-0060. See the Air Quality Analysis section of this review report for more information.

29f. The PSEL for GHGs has been set at the PTE as required under LRAPA 42-0041(2) for a source that demonstrates that the requested increase over the netting basis is less than the SER.

29g. As part of the modification requested by the facility, the PSEL limits for individual FHAP and aggregate FHAP have been removed from the Standard ACDP.

Significant Emission Rate

30. 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. For VOCs, the increase over netting basis is due to the proposed modification.

Pollutant	Proposed PSEL (TPY)	PSEL Increase Over Netting Basis (TPY)	PSEL Increase Due to Utilizing Existing Baseline Period Capacity (TPY)	PSEL Increase Due to Modification (TPY)	SER (TPY)
PM	24	0	0	0	25
PM_{10}	24	3	0	0	15
$PM_{2.5}$	22	9	0	0	10
CO	99	97	0	0	100
NO_x	39	30	0	0	40
SO_2	39	25	0	0	40
VOC	249	239	0	239	40
GHGs	76,933	72,557	0	0	75,000

Unassigned Emissions and Emission Reduction Credits

31. 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	Proposed Netting Basis (TPY)	PTE (TPY)	Unassigned Emissions (TPY)	Emission Reduction Credits (TPY)	SER (TPY)
PM	25	20	5	0	25
PM_{10}	21	19	2	0	15
$PM_{2.5}$	13	19	0	0	10
CO	2	24	0	0	100
NO_x	9	24	0	0	40
SO_2	14	1.1	13	0	40
VOC	10	249	0	0	40
GHGs	4,376	76,933	0	0	75,000

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

32. This source is located in an area that is designated attainment or unclassified for all regulated pollutants other than CO and PM_{10}. For pollutants other than CO and PM_{10}, the proposed PSELs are less than the federal major source threshold for non-listed sources of 250 TPY per regulated pollutant and are not subject to Major NSR. For CO and PM_{10}, the source is located in a maintenance area. The proposed PSELs for CO and PM_{10} are less than the 100 TPY threshold that determines the applicability of Major NSR.

Type A and Type B State NSR

33. For regulated pollutants other than VOCs, the proposed modifications will not have emissions per regulated pollutant equal to or greater than the SER over the netting basis that would require Type A or B State NSR. For VOCs, emissions of VOCs will increase to an amount that is equal to or greater than the SER over the netting basis. Because the source is located in an area that is attainment for ozone, VOCs will be subject to Type B State NSR.

34. Within an attainment or unclassified area, a source subject to Type B State NSR must:
    34a. Determine compliance with the NAAQS, PSD increments, and other requirements in PSD Class II and Class III areas under LRAPA 40-0050(1)&(2), as applicable.
    34b. Since this facility will emit ozone precursors (VOC or NO_X) at or above the SER over the netting basis and they are located within 100 km of the Salem-Keizer ozone maintenance area, this project must also meet the requirements for demonstrating net air quality benefit under LRAPA 38-0510 and 38-0520.

Air Quality Analysis

35. Under LRAPA 40-0050(1), a facility must demonstrate compliance with the NAAQS, PSD increments, and other requirements in PSD Class II areas. LRAPA has performed a single source impact analysis as described below to demonstrate the proposed modification at the facility will not cause or contribute to a new violation of a NAAQS and PSD increment. This single source impact analysis is sufficient to show compliance if the modeled impact from emission increases equal to or greater than a SER above the netting basis due to the proposed modification being evaluated is less than any applicable Class II significant impact levels specified in LRAPA title 12, Table 1. The use of the SIL (Significant Impact Level) by itself satisfies LRAPA 40-0050(1)(b) because the background ozone concentrations in Lane County are more than the SIL below the applicable NAAQS and the formation of ozone does not result in concentration gradients in the vicinity of the source. In addition, based on the results of the single-source impact analysis, LRAPA has determined that the facility will not have a material effect on the Salem-Keizer ozone maintenance area under LRAPA 38-0520(2)(b).

36. The United States Environmental Protection Agency (U.S. EPA) established a two-tiered approach for addressing impacts of single-source emissions on ozone (O_3). The first tier involves the use of appropriate and technically credible relationships between emissions and ambient impacts. The second tier involves use of chemical transport modeling to obtain single-source impacts. In December 2016, U.S. EPA published a draft document, “Guidance on the Development of Modeled Emission Rates for Precursors (MERPs) as a Tier 1 Demonstration Tools for Ozone and $PM_{2.5}$ under the PSD Permitting Program”. The term MERP is used to describe an emission rate of a precursor that is expected to result in a change in ambient O_3 or $PM_{2.5}$ concentration that would not cause or contribute to a violation of the NAAQS. Separate MERPs are developed for each precursor and each pollutant. Projected increases in the O_3 precursor pollutants NO_X and VOC that are below the MERP are part of a demonstration that the facility will not cause or contribute to violation of the O_3 NAAQS. Based upon the guidance, the most conservative, or lowest, MERPs from the Western US were used to determine whether the proposed emissions from the facility would cause or contribute to a violation of the NAAQS for ozone. Using the modeled concentration for the minimum MERP source in the Western US, an emission rate equivalent to a 1.0 parts per billion (ppb) impact was computed for NO_X and VOC. The facility’s pollutant emissions are below these MERPs, but the contributions should be considered together to determine if the facility would cause or contribute to a violation of the NAAQS for ozone. The ratio of emissions to the MERP for each precursor were calculated and then added together. Since the sum of the ratio is not above 1.0 ppb, as shown below, the combined impact of NO_X and VOC emissions would not cause or contribute to a violation of the NAAQS for ozone.

Precursor	Western US MERP (tons)	Hypothetical Emissions (TPY)	Associated Modeled Concentration (ppb)	SSC Emissions (TPY)	Ratio SSC / MERP (ppb)	Ozone SIL (ppb)
VOC	1053	1000	0.95	249	0.237	
NO_X	184	500	2.72	24	0.131	
				Total =	0.367	1.0
Calculation: SSC O_3 contribution = (24/500 * 2.72 ppb) + (249/1000 * 0.95 ppb) = 0.367 ppb < 1.0 ppb O_3 SIL						

Federal Hazardous Air Pollutants/Toxic Air Contaminants

37. SSC is currently 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 SSC and SSE combined. As part of the proposed expansion, SSC has requested the removal of these specific FHAP limitations on SSC. Upon issuance of the renewed Standard ACDP, SSC will be considered a major source of FHAPs.

38. The Standard ACDP will retain a requirement that limits the maximum temperature in each dry kiln to no more than 200 degrees Fahrenheit (dry bulb) as monitored and recorded on a 3 hour block average. This condition is part of defining the potential emissions of FHAP and CAO TACs from the facility.

39. 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

40. The table below represents the potential emissions of FHAPs/TACs from SSC assuming operation at full capacity, excluding emergency generator operation. The potential emissions are calculated based on standard emission factors for the types of emission units at this facility.

CAS Number	Pollutant	PTE (TPY)	FHAP	CAO TAC
Organics				
75-07-0	Acetaldehyde	30.5	Yes	Yes
107-02-8	Acrolein	0.49	Yes	Yes
71-43-2	Benzene	2.4E-02	Yes	Yes
100-41-4	Ethyl Benzene	2.1E-02	Yes	Yes
50-00-0	Formaldehyde	0.68	Yes	Yes
110-54-3	Hexane	5.6E-02	Yes	Yes
67-56-1	Methanol	29.6	Yes	Yes
91-20-3	Naphthalene	1.9E-04	Yes	Yes
NA	POM (inc. PAHs)	2.6E-04	Yes	Yes

CAS Number	Pollutant	PTE (TPY)	FHAP	CAO TAC
123-38-6	Propionaldehyde	0.32	Yes	Yes
115-07-1	Propylene	0.34	No	Yes
108-88-3	Toluene	0.13	Yes	Yes
540-84-1	2,2,4-Trimethylpentane	2.2E-02	Yes	Yes
1330-20-7	Xylenes	7.2E-02	Yes	Yes
Inorganic Gases				
7664-41-7	Ammonia	2.05	No	Yes
Metals				
7440-38-2	Arsenic	1.3E-04	Yes	Yes
7440-41-7	Beryllium	7.7E-06	Yes	Yes
7440-43-9	Cadmium	7.0E-04	Yes	Yes
7440-47-3	Chromium, Hexavalent	9.0E-04	Yes	Yes
7439-96-5	Manganese	2.4E-04	Yes	Yes
7439-97-6	Mercury	1.7E-04	Yes	Yes
7440-02-0	Nickel	1.3E-03	Yes	Yes
7782-49-2	Selenium	1.5E-05	Yes	Yes
	Total (TPY) =	64.3	61.9	64.3

National Emission Standards for Hazardous Air Pollutants (NESHAPs)

40 CFR Part 63 subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products

41. Upon issuance of the Standard ACDP, SSC will become a major source of FHAPs. As such, the eight (8) existing and two (2) proposed dry kilns will become subject to the requirements under 40 CFR Part 63 subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products. Although this facility does not manufacture plywood or composite wood products, the definition of "plywood and composite wood products manufacturing facility" includes lumber kilns located at any facility. Because the facility is an affected source that was constructed prior to January 9, 2003, and has not been reconstructed as defined in 40 CFR 63.2 since that time, the affected source is considered to be existing under this regulation. Under 40 CFR 63.2233(c), the facility must be in compliance with this regulation upon initial startup of the affected source as a major source (upon permit issuance).

40 CFR 63 subpart DDDD Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
63.2230	Purpose	Yes	None.	NA
63.2231	Applicability	Yes	None.	NA
63.2232	Affected sources	Yes	None.	NA
63.2233	Compliance dates	Yes	None.	NA
63.2240	Compliance options and operating requirements	No	None.	NA
63.2241	Work practice requirements	No	None.	NA
63.2250	General requirements	No	None.	NA
63.2251	Requirements for the routine control device maintenance exemption	No	None.	NA

40 CFR 63 subpart DDDD Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
63.2252	Requirements for process units that have no control or work practice requirements	Yes	Lumber kilns are only subject to initial notification under 40 CFR 63.9(b). No further requirements apply. The ACDP application fulfilled the initial notification requirement as allowed under 40 CFR 63.9(b)(2).	30, 31
63.2260	Initial compliance with the compliance options, operating requirements, and work practice requirements	No	None.	NA
63.2261	Performance tests or other initial compliance demonstrations	No	None.	NA
63.2262	Conducting performance tests and establishing operating requirements	No	None.	NA
63.2263	Initial compliance for a dry rotary dryer	No	None.	NA
63.2264	Initial compliance for a hardwood veneer dryer	No	None.	NA
63.2265	Initial compliance for a softwood veneer dryer	No	None.	NA
63.2266	Initial compliance for a veneer dryer	No	None.	NA
63.2267	Initial compliance for a reconstituted wood product press or board cooler	No	None.	NA
63.2268	Initial compliance for a wet control device	No	None.	NA
63.2269	Monitoring installation, operation, and maintenance requirements	No	None.	NA
63.2270	Continuous compliance monitoring and data collection	No	None.	NA
63.2271	Continuous compliance with the compliance options, operating requirements, and work practice requirements	No	None.	NA
63.2280	Notifications	No	None.	NA
63.2281	Reports	No	None.	NA
63.2282	Records	No	None.	NA
63.2283	Form and retention of records	No	None.	NA
63.2290	General Provision applicability	No	None.	NA
63.2291	Implementation and enforcement	No	None.	NA
63.2292	Definitions	Yes	None.	NA

40 CFR Part 63 subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

42. Upon issuance of the Standard ACDP, the facility will become a major source of FHAPs. As such, Boiler-3, Boiler-4 and Boiler-5 will become subject to the requirements under 40 CFR 63 subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. Boiler-3 is considered an existing boiler under 40 CFR 63.7490(b) because although the boiler was installed after June 4, 2010, the facility was an area source at the time of installation. Boiler-4 and Boiler-5 will be considered new boilers. Under 40 CFR 63.7495(c)(2), Boiler-3 must be in compliance with this regulation within 3 years after the facility becomes a major source of FHAP. Boiler-4 and Boiler-5 must be in compliance with this regulation upon startup.

43. The 40 CFR 63 subpart DDDDD requirements that are applicable to Boiler-3, Boiler-4 and Boiler-5 at the facility are identified in the following table:

40 CFR 63 subpart DDDDD Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
63.7480	Purpose	Yes	None.	NA
63.7485	Applicability	Yes	None.	NA
63.7490	Affected source	Yes	Boiler-3 is existing. Boiler-4 and Boiler-5 are new.	NA
63.7491	Exceptions to affected source	No	None.	NA
63.7495	Compliance dates	Yes	Boiler-3 has three years to comply. Boiler-4 and Boiler-5 must comply upon startup.	19
63.7499	Subcategories	Yes	Boilers are designed to burn gas 1 fuels.	NA
63.7500	Emission limitations, work practice standards, and operating limits	Yes	Conduct a tune-up annually or every 5 years, one-time energy assessment	20
63.7505	General requirements	Yes	None.	21
63.7510	Initial compliance requirements	No	None.	22
63.7515	Subsequent performance tests, fuel analyses, or tune-ups	Yes	Conduct a tune-up annually or once every 5 years	23
63.7520	Stack tests and procedures	No	None.	NA
63.7521	Fuel analyses, fuel specifications, and procedures	No	None.	NA
63.7522	Emissions averaging	No	None.	NA
63.7525	Monitoring, installation, operation, and maintenance requirements	No	None.	NA
63.7530	Initial compliance with emission limitations, fuel specifications and work practice standards	Yes	None.	24
63.7533	Efficiency credits	No	None.	NA
63.7535	Minimum monitoring data	No	None.	NA

40 CFR 63 subpart DDDDD Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
63.7540	Continuous compliance with emission limitations, fuel specifications and work practice standards	Yes	None.	25
63.7541	Continuous compliance with emission averaging	No	None.	NA
63.7545	Notifications	Yes	None.	26
63.7550	Reports	Yes	None.	27
63.7555	Records	Yes	None.	28
63.7560	Form and retention of records	Yes	None.	29
63.7565	General Provision applicability	Yes	None.	NA
63.7570	Implementation and enforcement	Yes	None.	NA
63.7575	Definitions	Yes	None.	NA

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

44. The facility is permitted currently as an area source of FHAPs. The facility has one (1) gasoline dispensing facility subject to the area source requirements under 40 CFR Part 63 subpart CCCCCC – National Emission Standards of Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities. Upon issuance of the Standard ACDP, the facility will become a major source of FHAPs and 40 CFR 63 subpart CCCCCC will no longer apply. There is no equivalent major source NESHAP for gasoline dispensing facilities.

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

45. The facility is permitted currently as an area source of FHAPs. Upon issuance of the Standard ACDP, the facility will become a major source of FHAPs. 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)(6), a new or reconstructed emergency or limited use stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of FHAP emissions 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 these engines under 40 CFR 63 subpart ZZZZ

46. The 40 CFR Part 63 subpart ZZZZ requirements that are applicable to CIA-1 are identified in the following table:

40 CFR Part 63, subpart ZZZZ Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
63.6580	Purpose	Yes	None.	NA
63.6585	Applicability	Yes	None.	NA

40 CFR Part 63, subpart ZZZZ Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
63.6590	Applicability	Yes	Subject to limited requirements.	32
63.6600	Emission limitations	No	None.	NA
63.6601	Emission limitations	No	None.	NA
63.6602	Emission limitations	No	None.	NA
63.6603	Emission limitations	No	None.	NA
63.6604	Fuel requirements	No	None.	NA
63.6605	General requirements	No	None.	NA
63.6610	Initial compliance	No	None.	NA
63.6611	Initial performance test	No	None.	NA
63.6612	Initial performance test	No	None.	NA
63.6615	Subsequent performance tests	No	None.	NA
63.6620	Performance test procedures	No	None.	NA
63.6625	Monitoring and maintenance requirements	No	None.	NA
63.6630	Initial compliance	No	None.	NA
63.6635	Continuous compliance	No	None.	NA
63.6640	Continuous compliance	No	None.	NA
63.6645	Notifications	No	None.	NA
63.6650	Reports	No	None.	NA
63.6655	Records	No	None.	NA
63.6660	Record retention	No	None.	NA
63.6665	General provisions	No	None.	NA
63.6670	Implementation and enforcement	No	None.	NA
63.6675	Definitions	No	None.	NA

<u>New Source Performance Standards (NSPSs)</u>
40 CFR 60 subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

47. 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, Boiler-4, and Boiler-5 were or will be constructed after the applicability date and have a maximum heat input capacity of 50 MMBtu per hour each. Each boiler is or will be subject to this regulation.

48. The 40 CFR 60 subpart Dc requirements that are applicable to Boiler-3, Boiler-4 and Boiler-5 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	Each boiler has a maximum heat input capacity between 10 and 100 MMBtu per hour.	NA
60.41c	Definitions	Yes	Each boiler meets the definition of a *steam generating unit*.	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 each boiler.	18

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

49. 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.

50. 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).

51. 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 description of an emergency generator in the definition of

"Categorically Insignificant Activity" LRAPA title 12, does not allow an emergency generator to be used in this manner in the state of Oregon. The portions of the rule that conflict with the definition in LRAPA title 12 have not been included in the draft permit. There is no time limit on the use of emergency stationary ICE in emergency situations.

52. 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 Envtl. 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.

53. 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	Applicability	Yes	None.	NA
60.4201	Emission standards	No	None.	NA
60.4202	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.	33
60.4203	Emission standards	No	None.	NA
60.4204	Emission standards	No	None.	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.	33
60.4206	Emission standards	Yes	The emission standards are applicable for the life of the engine.	35
60.4207	Fuel requirements	Yes	Must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel.	36
60.4208	Requirements	No	None.	NA
60.4209	Monitoring requirements	Yes	Installation of a non-resettable hour meter.	37
60.4210	Compliance requirements	No	None.	NA
60.4211	Compliance requirements	Yes	None.	38
60.4212	Testing requirements	No	None.	NA
60.4213	Testing Methods	No	None.	NA
60.4214	Notification, reporting, and recordkeeping requirements	Yes	None.	39

40 CFR 60 subpart IIII Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
60.4215	Special requirements.	No	None.	NA
60.4216	Special requirements	No	None.	NA
60.4217	Special requirements	No	None.	NA
60.4218	General provisions	Yes	None.	NA
60.4219	Definitions	Yes	None.	NA

Toxic Release Inventory

54. The Toxics Release Inventory (TRI) is federal program that tracks the management of certain toxic chemicals that may pose a threat to human health and the environment, over which LRAPA has no regulatory authority. It is a resource for learning about toxic chemical releases and pollution prevention activities reported by certain industrial facilities. Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) created the TRI Program. In general, chemicals covered by the TRI Program are those that cause:

    - Cancer or other chronic human health effects;
    - Significant adverse acute human health effects; or
    - Significant adverse environmental effects.

    There are currently over 650 chemicals covered by the TRI Program. Facilities that manufacture, process or otherwise use these chemicals in amounts above established levels must submit annual TRI reports on each chemical. NOTE: The TRI Program is a federal program over which LRAPA has no regulatory authority. LRAPA does not guarantee the accuracy of any information copied from EPA's TRI website.

    In order to report emissions to the TRI program, a facility must operate under a reportable NAICS code, meet a minimum employee threshold, and manufacture, process, or otherwise use chemicals in excess of the applicable reporting threshold for the chemical. This facility has not reported any emissions to the TRI program because they do not manufacture, process, or otherwise use chemicals in excess of the applicable reporting thresholds.

Compliance History

55. 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

Type of Inspection	Date	Results
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

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

    56a. 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.

    56b. 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.

    56c. 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.

    56d. 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

    56e. 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.

    56f. 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

57. 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

58. 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
NSPS Dc Recordkeeping		
Initial notification for NSPS Dc	NA	One time
Natural gas combusted	MMSCF	Monthly
NESHAP DDDDD (5D) Recordkeeping		
Initial notification for NESHAP 5D	NA	One time
Notice of compliance status	NA	One time
Energy assessment	NA	One time
5 year tune-up	NA	Every 5 years
NESHAP DDDD (4D) Recordkeeping		
Initial notification for NESHAP 5D	NA	One time
NSPS IIII Recordkeeping		
The date and time of operation in hours of CIA-1	Date, Hours of operation	Each occurrence
Reason for operation of CIA-1	NA	Each occurrence
The total hours that CIA-1 operates for emergency reasons in a calendar year	Hours	Monthly
The total hours that CIA-1 operates for non-emergency reasons in a calendar year	Hours	Monthly
LRAPA Title 44 Recordkeeping		
Initial notification for Title 44	NA	One time
The monthly gasoline throughput of the GDF	1000 Gallons	Monthly
The annual gasoline throughput of the GDF in any 12 consecutive months	1000 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

59. 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, if monthly gasoline throughput is greater than or equal to 10,000 gallons in a calendar year.	Annual	February 15
The upset log information required by Condition G.13 of the permit, if required by G.13.	Annual	March 1
Annual emissions as calculated according to Conditions 4 and 6 of the permit, including the supporting process parameter and emission factor information	Annual	March 1
Reports required under 40 CFR 63 subpart 5D	Every 5 Years	March 1
GHG report, if required by Condition **Error! Reference source not found.** of the permit	Annual	March 31

60. 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

61. The proposed permit will be on public notice from July 12, 2022 to August 22, 2022. Written comments may be submitted during the 40-day comment period. LRAPA will hold a public hearing on August 10, 2022.

    After the comment period and hearing, 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 comment or hearing period.

JJW/cmw
06/28/2022

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	24	5	0	20	25
PM_{10}	13	21	13	21	27	24	2	3	19	15
$PM_{2.5}$	NA	NA	8	13	16	22	0	9	19	10
CO	2	2	2	2	99	99	0	97	24	100
NO_X	9	9	9	9	48	39	0	30	24	40
SO_2	14	14	14	14	53	39	13	25	1.1	40
VOC	10	10	10	10	99	249	0	239	249	40
GHG (CO2 eq.)	0	4,376	0	4,376	74,000	76,933	0	72,557	76,933	75,000

Notes:

Seneca Sawmill Company - 207459
Emission Detail Sheets
Facility Potential Emission Summary

Criteria Pollutants

		Pollutant (TPY)							
EU ID	**Emission Unit Description**	**PM**	**PM_{10}**	**$PM_{2.5}$**	**CO**	**NO_X**	**SO_2**	**VOC**	**GHG**
Boiler-3	50 MMBtu/hr NG Boiler	0.53	0.53	0.53	8.10	7.88	0.36	249	25,644
Boiler-4	50 MMBtu/hr NG Boiler	0.53	0.53	0.53	8.10	7.88	0.36		25,644
Boiler-5	50 MMBtu/hr NG Boiler	0.53	0.53	0.53	8.10	7.88	0.36		25,644
Kilns	Ten (10) Dry Kilns	13.50	13.50	13.50	NA	NA	NA		NA
MH	Sawmill/Planing Mill Activities	4.6	3.9	3.9	NA	NA	NA		NA
GDF	Gasoline Dispensing Facility	NA	NA	NA	NA	NA	NA		NA
	Total =	**20**	**19**	**19**	**24**	**24**	**1.1**	**249**	**76,933**

			Federal	CAO
CAS Number	**Pollutant**	**TPY**	**HAP**	**Toxic**
Organics				
75-07-0	Acetaldehyde	30.5	Yes	Yes
107-02-8	Acrolein	0.49	Yes	Yes
71-43-2	Benzene	2.4E-02	Yes	Yes
100-41-4	Ethyl Benzene	2.1E-02	Yes	Yes
50-00-0	Formaldehyde	0.68	Yes	Yes
110-54-3	Hexane	5.6E-02	Yes	Yes
67-56-1	Methanol	29.6	Yes	Yes
91-20-3	Naphthalene	1.9E-04	Yes	Yes
NA	POM (inc. PAHs)	2.6E-04	Yes	Yes
123-38-6	Propionaldehyde	0.32	Yes	Yes
115-07-1	Propylene	0.34	No	Yes
108-88-3	Toluene	0.13	Yes	Yes
540-84-1	2,2,4-Trimethylpentane	2.2E-02	Yes	Yes
1330-20-7	Xylenes	7.2E-02	Yes	Yes
Inorganic Gases				
7664-41-7	Ammonia	2.05	No	Yes
Metals				
7440-38-2	Arsenic	1.3E-04	Yes	Yes
7440-41-7	Beryllium	7.7E-06	Yes	Yes
7440-43-9	Cadmium	7.0E-04	Yes	Yes
7440-47-3	Chromium, Hexavalent	9.0E-04	Yes	Yes
7439-96-5	Manganese	2.4E-04	Yes	Yes
7439-97-6	Mercury	1.7E-04	Yes	Yes
7440-02-0	Nickel	1.3E-03	Yes	Yes
7782-49-2	Selenium	1.5E-05	Yes	Yes
	Total =	64.3	61.9	64.3

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

Boiler Specifications

Max Heat Input	50	MMBtu/hr
Heat Value - Natural Gas	1026	MMBtu/MMCF
Max Hrs Operation	8760	hr/yr

Criteria Pollutants

Pollutant	NG Emission Factor (lb/MMCF)	NG Emission Factor Units	Potential Hourly Emissions (lbs/hr)	Potential Annual Emissions (TPY)	NG Emission Factor Conversion	NG Emission Factor Units
$PM/PM_{10}/PM_{2.5}$	2.5	lbs/MMCF	0.12	0.53		
Carbon Monoxide	0.037	lbs/MMBtu	1.85	8.10	38	lbs/MMCF
Nitrogen Oxides	0.036	lbs/MMBtu	1.80	7.88	37	lbs/MMCF
Sulfur Dioxide	1.7	lbs/MMCF	0.08	0.36		
VOCs	5.5	lbs/MMCF	0.27	1.17		
GHGs (CO_2 equiv.)	117	lbs/MMBtu	5,855	25,644		

HAP Emissions

Pollutant	NG Emission Factor (lb/MMCF)	Potential Hourly Emissions (lbs/hr)	Potential Annual Emissions (TPY)	Federal HAP	CAO Air Toxic
Organics					
Acetaldehyde	0.0031	1.5E-04	6.6E-04	Yes	Yes
Acrolein	0.0027	1.3E-04	5.8E-04	Yes	Yes
Benzene	0.0058	2.8E-04	1.2E-03	Yes	Yes
Ethyl Benzene	0.0069	3.4E-04	1.5E-03	Yes	Yes
Formaldehyde	0.0123	6.0E-04	2.6E-03	Yes	Yes
Hexane	0.0046	2.2E-04	9.8E-04	Yes	Yes
Naphthalene	0.0003	1.5E-05	6.4E-05	Yes	Yes
POM (inc. PAHs)	0.0004	1.9E-05	8.5E-05	Yes	Yes
Propylene	0.5300	2.6E-02	1.1E-01	No	Yes
Toluene	0.0265	1.3E-03	5.7E-03	Yes	Yes
Xylenes	0.0197	9.6E-04	4.2E-03	Yes	Yes
Inorganic Gases					
Ammonia	3.2000	1.6E-01	6.8E-01	No	Yes
Metals					
Arsenic	2.0E-04	9.7E-06	4.3E-05	Yes	Yes
Beryllium	1.2E-05	5.8E-07	2.6E-06	Yes	Yes
Cadmium	1.1E-03	5.4E-05	2.3E-04	Yes	Yes
Chromium, Hexavalent	1.4E-03	6.8E-05	3.0E-04	Yes	Yes
Manganese	3.8E-04	1.9E-05	8.1E-05	Yes	Yes
Mercury	2.6E-04	1.3E-05	5.5E-05	Yes	Yes
Nickel	2.1E-03	1.0E-04	4.5E-04	Yes	Yes
Selenium	2.4E-05	1.2E-06	5.1E-06	Yes	Yes
Total =	3.82		0.81	0.02	0.81

GHG-Related Emission Factors

Pollutant	Natural Gas (kg/MMBtu)	GWP
Carbon Dioxide (CO_2)	53.06	1
Methane (CH_4)	1.0E-03	25
Nitrous Oxide (N_2O)	1.0E-04	298

Notes:

NOx and CO emission factors are based on manufacturer guarantees
$PM/PM_{10}/PM_{2.5}$, SO_2, and VOC emissions factors are based on DEQ Emission Factors Gas Fired Boilers, AQ-EF05 (08/01/2011)
GHG emission factors are from 40 CFR 98, Tables C-1 and C-2
Toxics emission factors, except for metals and ammonia, are based on Ventura County APCD "AB 2588 Combustion Emission Factors"
Toxics emission factors for metals are based on US EPA AP-42 Section 1.4 - Natural Gas Combustion (07/1998)
Ammonia emission factor is based on US EPA WebFire SCC 1-002-006-02 for an uncontrolled boiler
Chromium assumed to be hexavalent

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

Boiler Specifications

Max Heat Input	50	MMBtu/hr
Heat Value - Natural Gas	1026	MMBtu/MMCF
Max Hrs Operation	8760	hr/yr

Criteria Pollutants

Pollutant	NG Emission Factor (lb/MMCF)	NG Emission Factor Units	Potential Hourly Emissions (lbs/hr)	Potential Annual Emissions (TPY)	NG Emission Factor Conversion	NG Emission Factor Units
$PM/PM_{10}/PM_{2.5}$	2.5	lbs/MMCF	0.12	0.53		
Carbon Monoxide	0.037	lbs/MMBtu	1.85	8.10	38	lbs/MMCF
Nitrogen Oxides	0.036	lbs/MMBtu	1.80	7.88	37	lbs/MMCF
Sulfur Dioxide	1.7	lbs/MMCF	0.08	0.36		
VOCs	5.5	lbs/MMCF	0.27	1.17		
GHGs (CO_2 equiv.)	117	lbs/MMBtu	5,855	25,644		

HAP Emissions

Pollutant	NG Emission Factor (lb/MMCF)	Potential Hourly Emissions (lbs/hr)	Potential Annual Emissions (TPY)	Federal HAP	CAO Air Toxic
Organics					
Acetaldehyde	0.0031	1.5E-04	6.6E-04	Yes	Yes
Acrolein	0.0027	1.3E-04	5.8E-04	Yes	Yes
Benzene	0.0058	2.8E-04	1.2E-03	Yes	Yes
Ethyl Benzene	0.0069	3.4E-04	1.5E-03	Yes	Yes
Formaldehyde	0.0123	6.0E-04	2.6E-03	Yes	Yes
Hexane	0.0046	2.2E-04	9.8E-04	Yes	Yes
Naphthalene	0.0003	1.5E-05	6.4E-05	Yes	Yes
POM (inc. PAHs)	0.0004	1.9E-05	8.5E-05	Yes	Yes
Propylene	0.5300	2.6E-02	1.1E-01	No	Yes
Toluene	0.0265	1.3E-03	5.7E-03	Yes	Yes
Xylenes	0.0197	9.6E-04	4.2E-03	Yes	Yes
Inorganic Gases					
Ammonia	3.2000	1.6E-01	6.8E-01	No	Yes
Metals					
Arsenic	2.0E-04	9.7E-06	4.3E-05	Yes	Yes
Beryllium	1.2E-05	5.8E-07	2.6E-06	Yes	Yes
Cadmium	1.1E-03	5.4E-05	2.3E-04	Yes	Yes
Chromium, Hexavalent	1.4E-03	6.8E-05	3.0E-04	Yes	Yes
Manganese	3.8E-04	1.9E-05	8.1E-05	Yes	Yes
Mercury	2.6E-04	1.3E-05	5.5E-05	Yes	Yes
Nickel	2.1E-03	1.0E-04	4.5E-04	Yes	Yes
Selenium	2.4E-05	1.2E-06	5.1E-06	Yes	Yes
Total =	3.82		0.81	0.02	0.81

GHG-Related Emission Factors

Pollutant	Natural Gas (kg/MMBtu)	GWP
Carbon Dioxide (CO_2)	53.06	1
Methane (CH_4)	1.0E-03	25
Nitrous Oxide (N_2O)	1.0E-04	298

Notes:

NOx and CO emission factors are based on manufacturer guarantees
$PM/PM_{10}/PM_{2.5}$, SO_2, and VOC emissions factors are based on DEQ Emission Factors Gas Fired Boilers, AQ-EF05 (08/01/2011)
GHG emission factors are from 40 CFR 98, Tables C-1 and C-2
Toxics emission factors, except for metals and ammonia, are based on Ventura County APCD "AB 2588 Combustion Emission Factors"
Toxics emission factors for metals are based on US EPA AP-42 Section 1.4 - Natural Gas Combustion (07/1998)
Ammonia emission factor is based on US EPA WebFire SCC 1-002-006-02 for an uncontrolled boiler
Chromium assumed to be hexavalent

Seneca Sawmill Company - 207459
Emission Detail Sheets
Boiler-5 Emission Calculations

Boiler Specifications

Max Heat Input	50	MMBtu/hr
Heat Value - Natural Gas	1026	MMBtu/MMCF
Max Hrs Operation	8760	hr/yr

Criteria Pollutants

Pollutant	NG Emission Factor (lb/MMCF)	NG Emission Factor Units	Potential Hourly Emissions (lbs/hr)	Potential Annual Emissions (TPY)	NG Emission Factor Conversion	NG Emission Factor Units
$PM/PM_{10}/PM_{2.5}$	2.5	lbs/MMCF	0.12	0.53		
Carbon Monoxide	0.037	lbs/MMBtu	1.85	8.10	38	lbs/MMCF
Nitrogen Oxides	0.036	lbs/MMBtu	1.80	7.88	37	lbs/MMCF
Sulfur Dioxide	1.7	lbs/MMCF	0.08	0.36		
VOCs	5.5	lbs/MMCF	0.27	1.17		
GHGs (CO_2 equiv.)	117	lbs/MMBtu	5,855	25,644		

HAP Emissions

Pollutant	NG Emission Factor (lb/MMCF)	Potential Hourly Emissions (lbs/hr)	Potential Annual Emissions (TPY)	Federal HAP	CAO Air Toxic
Organics					
Acetaldehyde	0.0031	1.5E-04	6.6E-04	Yes	Yes
Acrolein	0.0027	1.3E-04	5.8E-04	Yes	Yes
Benzene	0.0058	2.8E-04	1.2E-03	Yes	Yes
Ethyl Benzene	0.0069	3.4E-04	1.5E-03	Yes	Yes
Formaldehyde	0.0123	6.0E-04	2.6E-03	Yes	Yes
Hexane	0.0046	2.2E-04	9.8E-04	Yes	Yes
Naphthalene	0.0003	1.5E-05	6.4E-05	Yes	Yes
POM (inc. PAHs)	0.0004	1.9E-05	8.5E-05	Yes	Yes
Propylene	0.5300	2.6E-02	1.1E-01	No	Yes
Toluene	0.0265	1.3E-03	5.7E-03	Yes	Yes
Xylenes	0.0197	9.6E-04	4.2E-03	Yes	Yes
Inorganic Gases					
Ammonia	3.2000	1.6E-01	6.8E-01	No	Yes
Metals					
Arsenic	2.0E-04	9.7E-06	4.3E-05	Yes	Yes
Beryllium	1.2E-05	5.8E-07	2.6E-06	Yes	Yes
Cadmium	1.1E-03	5.4E-05	2.3E-04	Yes	Yes
Chromium, Hexavalent	1.4E-03	6.8E-05	3.0E-04	Yes	Yes
Manganese	3.8E-04	1.9E-05	8.1E-05	Yes	Yes
Mercury	2.6E-04	1.3E-05	5.5E-05	Yes	Yes
Nickel	2.1E-03	1.0E-04	4.5E-04	Yes	Yes
Selenium	2.4E-05	1.2E-06	5.1E-06	Yes	Yes
Total =	3.82		0.81	0.02	0.81

GHG-Related Emission Factors

Pollutant	Natural Gas (kg/MMBtu)	GWP
Carbon Dioxide (CO_2)	53.06	1
Methane (CH_4)	1.0E-03	25
Nitrous Oxide (N_2O)	1.0E-04	298

Notes:

NOx and CO emission factors are based on manufacturer guarantees
$PM/PM_{10}/PM_{2.5}$, SO_2, and VOC emissions factors are based on DEQ Emission Factors Gas Fired Boilers, AQ-EF05 (08/01/2011)
GHG emission factors are from 40 CFR 98, Tables C-1 and C-2
Toxics emission factors, except for metals and ammonia, are based on Ventura County APCD "AB 2588 Combustion Emission Factors"
Toxics emission factors for metals are based on US EPA AP-42 Section 1.4 - Natural Gas Combustion (07/1998)
Ammonia emission factor is based on US EPA WebFire SCC 1-002-006-02 for an uncontrolled boiler
Chromium assumed to be hexavalent

Seneca Sawmill Company - 207459

Emission Detail Sheets

Dry Kilns

Max Kiln Production	540,000	MBF/yr
Max Drying Temp	200	^{o}F
Max Kiln VOC PTE	249	TPY

Criteria Pollutants

	100% Douglas Fir			**100% Hemlock Fir**				
Pollutant	**Green Emission Factor (lb/MBF)**	**Burnt Emission Factor (lb/MBF)**	**Capacity Emissions (TPY)**	**Green Emission Factor (lb/MBF)**	**Burnt Emission Factor (lb/MBF)**	**Capacity Emissions (TPY)**	**Kiln Max Capacity Emissions (TPY)**	**Kiln PTE Potential Emissions (TPY)**
VOC	1.116	0.669	301	0.396	0.238	107.0	301	249
$PM/PM_{10}/PM_{2.5}$	0.020	0.020	5.40	0.050	0.050	13.5	13.5	13.5

FHAPs

	100% Douglas Fir			**100% Hemlock Fir**						
Pollutant	**Green Emission Factor (lb/MBF)**	**Burnt Emission Factor (lb/MBF)**	**Capacity Emissions (TPY)**	**Green Emission Factor (lb/MBF)**	**Burnt Emission Factor (lb/MBF)**	**Capacity Emissions (TPY)**	**Kiln Max Capacity Emissions (TPY)**	**Requested Kiln PTE Potential Emissions (TPY)**	**Federal HAP**	**CAO Air Toxic**
Acetaldehyde	0.0430	0.0258	11.61	0.1128	0.0677	30.5	30.5	30.5	Yes	Yes
Acrolein	0.0008	0.0005	0.22	0.0018	0.0011	0.49	0.49	0.49	Yes	Yes
Formaldehyde	0.0025	0.0015	0.68	0.0021	0.0012	0.56	0.68	0.56	Yes	Yes
Methanol	0.0754	0.0452	20.36	0.1097	0.0658	29.6	29.6	29.6	Yes	Yes
Propionaldehyde	0.0009	0.0005	0.24	0.0012	0.0007	0.32	0.32	0.32	Yes	Yes
Total =	0.1226	0.0736		0.2276	0.1366					

Notes:

VOC and HAP emission factors are from DEQ HAP and VOC Emission Factors for Lumber Drying, 2021, AQ-EF09 assuming a maximum kiln temperature of 200^{o}F

$PM/PM_{10}/PM_{2.5}$ emission factors are from DEQ Emission Factors Wood Products, AQ-EF02 (08/01/2011)

Burnt emission factors are based on the assumption in the application for NC-207459-A20 that burnt wood organic compound emissions are 60% of green wood

Seneca Sawmill Company - 207459
Emission Detail Sheets
Gasoline Dispensing Facility

Vehicles Equipped with ORVR in Lane County =	65	percent

GDF Activity - VOC Emissions (Submerged Fill Only)

Tank Filling =	7.70	lbs/Mgals
Breathing =	1.00	lbs/Mgals
Refueling - No ORVR =	10.36	lbs/Mgals
Refueling - ORVR =	0.21	lbs/Mgals
Spillage =	0.61	lbs/Mgals
Hose Permeation =	0.062	lbs/Mgals
Total =	13.13	lbs/Mgals

	gal/mo	**gal/yr**
Max GDF Throughput =	31,500	378,000

Pollutant	**Potential Hourly Emissions (lbs/hr)**	**Potential Annual Emissions (TPY)**
VOC	0.57	2.48

GDF Activity - HAP Emissions

Pollutant	**% by wt.**	**lbs/Mgals**	**Potential Emissions TPY**	**Federal HAP**	**CAO Air Toxic**
Benzene	0.82	0.11	0.020	Yes	Yes
Ethyl Benzene	0.66	0.09	0.016	Yes	Yes
Hexane	2.14	0.28	0.053	Yes	Yes
Toluene	4.36	0.57	0.108	Yes	Yes
2,2,4-Trimethylpentane	0.89	0.12	0.022	Yes	Yes
Xylenes, Total	2.39	0.31	0.059	Yes	Yes
		Total =	0.28	0.28	0.28

Notes:
ORVR = Onboard Refueling Vapor Recovery
Tank filling emission factor from CARB "Revised Emission Factors for Gasoline Marketing Operations at California Gasoline Dispensing Facilities (2013) - Table IV-I.
Breathing emission factor from US EPA AP-42, Table 5.2-7.
Refueling emission factor with no ORVR based on DEQ 2018 GDF VOC Estimates.
Refueling emissinon factor with ORVR based on DEQ 2018 GDF VOC Estimates.
Spillage emission factor from CARB "Revised Emission Factors for Gasoline Marketing Operations at California Gasoline Dispensing Facilities (2013) - Table VI-I.
Hose permeation emission factor from CARB "Revised Emission Factors for Gasoline Marketing Operations at California Gasoline Dispensing Facilities (2013) - Table VII-I.
FHAP weight percentages based on EPA Speciate v. 4.5.

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

	Original Baseline						Revised Baseline					
Seneca Sawmill	1977 or 1978 Thruput (BDT)	PM Emission Factor (lb/BDT)	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)
Mill A												
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
Mill B												
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
Tree Products												
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

Notes:

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 PM_{10} 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 PM_{10}.
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.