



SENECA SAWMILL COMPANY

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January 15, 2024

Via Certified Mail

Mr. Jonathan Wright
Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477

RE: Sierra Pacific Industries (Permit No. 207459) – Type 3 Change, Permit Modification for Sawmill Substantial Upgrade and Modification Project and Cleaner Air Oregon Emissions Inventory Submittal

Dear Jonathan:

The Seneca Sawmill Company (Seneca) operates a sawmill in Eugene that produces kiln-dried lumber from logs delivered to the facility. Seneca is submitting a Construction Air Contaminant Discharge Permit Application for a “Sawmill Substantial Upgrade and Modification” project. The project will modernize the sawmill operations by adding sawmill equipment, re-purposing existing equipment, including material handling equipment and emissions control devices.

Summary of Physical Equipment Changes:

- The four existing dimensional kilns (D1 – D4) will remain unchanged, but the existing four stud kilns will be replaced with eight new stud kilns. The total number of kilns at the site will be twelve, with an increased holding capacity at the facility.
- The previously permitted but never built Mill A Planer Baghouse No. 2 (EP-02B) should be removed from the permit, as there is no longer a plan to build.
- The Stud Mill Sawdust Baghouse (EP-05) will be relocated but otherwise remain unchanged.
- The Stud Mill Planer Shaving Baghouse (EP-06) will be replaced with a new Baghouse (identical to existing EP-05) and relocated to a new location southwest of the current location.
- The Planer Knife Grinding Cyclone (EP-04) and Mill A Grinder Cyclone (EP-07) will be removed.
- The Mill A Sawdust Baghouse (EP-08) will be re-purposed to serve the Planer Trim Saw Sawdust. Also, the throughput of material sent to this baghouse will decrease.
- A new Mill Grinding Cyclone and Baghouse (new EP-013) will replace the Mill A Filing Room Grinding Cyclone (EP-07) in a new location.

- A paint booth (EP-015) will be installed in the truck shop for maintenance and project related painting, not production-related. Low VOC latex paints will be sprayed, with no HAPs used.
- A plasma cutting table for fabrication support activities will be installed in the truck shop building, with an accessory oxy-acetylene torch, with cutting occurring directly above a water table.
- An additional categorically insignificant diesel fuel tank (12,000 gallon capacity) will be installed for on-site mobile equipment use.

Emissions from the project are summarized in the table below, which is also found as Table 3 of Attachment C:

EU ID	Emission Unit Description	Pollutant (TPY)							
		PM	PM10	PM2.5	CO	NOX	SO2	VOC	GHG
Kilns	Eight (8) Dry Kilns	9.64	9.64	9.64	NA	NA	NA	368.63	NA
MH*	Sawmill/Planing Mill Activities	0.03	0.03	0.03	NA	NA	NA	NA	NA
AIA	Mill Grinding	0.8	0.8	0.8	NA	NA	NA	NA	NA
AIA	Plasma table with torch	0.247	0.247	0.247	NA	NA	NA	NA	NA
AIA	Paint booth	0.006	0.006	0.006	NA	NA	NA	3.37	NA
AIA	Welding and Fabrication	0.031	0.031	0.031	NA	NA	NA	NA	NA
	Total Project Emissions	10.8	10.8	10.8	0.0	0.0	0.0	372.0	0.0
	Significant Emission Rate	25	15	10	100	40	40	40	75,000
		PM2.5 and VOC emissions, at capacity, are greater than their respective SER, so the project is a Type 3 change. No increase or change is being requested to the PSEL, so Federal or State NSR is not required.							

Seneca is not requesting any changes to its PSELs (See Table 1 of Attachment C); however, the max capacity of new, replaced or modified equipment results in emissions, at capacity, greater than the Significant Emission Rate for VOCs and PM2.5, which is why this modification is considered a Type 3 change per LRAPA Title 34 Section 34-035. Seneca is not requesting an increase in the PSEL for any pollutants, so neither Federal nor State New Source Review is required, because emissions are not increasing above the netting basis by more than the SER (LRAPA Title 38).

Administrative Changes that Seneca requests to be reflected in the Permit Modification are listed below:

- The drying kilns should be renumbered to K1 – K12, with former D1 – D4 changing to K1 – K4, and the eight new kilns becoming K5 – K12.

- The Mill A Planer Baghouse No. 1 (EP-02A) should be renamed the Dimension Planer Baghouse (EP-02).
- The Stud Mill Sawdust Baghouse (EP-05) should be renamed the Stud Mill Planer Baghouse No. 1.
- The Stud Mill Planer Shaving Baghouse (EP-06) should be renamed the Stud Mill Planer Baghouse No. 2.
- The Mill A Sawdust Baghouse (EP-08) should be renamed the Planer Trim Saw Sawdust Baghouse.

These changes do not result in any new applicable requirements, including no new NSPS or NESHAP requirements, and any modified or new control devices are already covered by existing permit conditions.

Seneca is also simultaneously submitting a Cleaner Air Oregon Emissions Inventory on the required AQ520 form, as well as the AQ523 Categorically Exempt TEUs form. The emissions calculations tables in Attachment C include explanation of the emissions calculation methodology for each emissions unit.

This submission includes the following attachments:

- Attachment A – LRAPA Forms
 - Form AQ101 – Administrative Form
 - Form AQ102 – Facility Description Form
- Attachment B – Site Information
 - Figure 1-1 Site Plan
 - Figure 1-2 Vicinity Map
 - Figure 1-3 USGS Map
 - Figure 1-4 Process Flow Diagram and Emissions Units
- Attachment C – Emissions Tables
 - Table 1 - Plant Site Emission Limits
 - Table 2 - Facility Potential Emissions Summary, Post-Project
 - Table 3 - Project Maximum Capacity Emission Summary
 - Table 4 - Boiler-3 Potential Emission Calculations
 - Table 5 - Boiler-4 Potential Emission Calculations
 - Table 6 - Boiler-5 Potential Emission Calculations
 - Table 7 – Boiler NG Combustion TAC Emissions
 - Table 8 - Drying Kilns Emissions
 - Table 9 - Sawmill/Planing Mill Activities and Baghouse Emissions
 - Table 10 - Gasoline Dispensing Facility Annual VOC Emissions
 - Table 11 - Gasoline Dispensing Facility TAC Emissions
 - Table 12 - Mill Grinding Baghouse TAC Emissions - AIA

- Table 13 - Paint Booth Emissions - AIA
- Table 14 - Electric Arc Welding Emissions - AIA
- Table 15 - Metal Cutting Emissions (Plasma and Oxyfuel Torch) - AIA
- Table 16 - Diesel Emergency Generator Emissions - CIA
- Attachment D – Kiln Information
 - Form DV203 – Lumber Dry Kilns Form
 - Kiln Specification
- Attachment E – Stud Mill Planer Baghouse Information (EP-06)
 - Form CD303 – Baghouse Form
 - Pneu-Aire Filter Baghouse Information
- Attachment F – Mill Grinding Baghouse Information
 - Form CD303 – Baghouse Form
 - Mill Grinding Baghouse Information
 - Mill A Grinding Analytical
- Attachment G – Paint Booth Information
 - Form AQ211 – Surface Coating
 - Paint SDS
 - Paint Filter, Gun and Pump Information
- Attachment H – Weld Wire SDS
- Attachment I – Cleaner Air Oregon Forms
 - AQ520 Emissions Inventory
 - AQ523 Categorically Exempt TEUs

Seneca is requesting LRAPA to review and confirm the appropriate complexity of this technical modification, whether simple, moderate or complex, and then Seneca will submit a check for the appropriate fee.

If you have any questions as you review these documents, please do not hesitate to contact me at bpowell@spi-ind.com or 541-689-1011.

Sincerely,



Bill Powell
Oregon Area Manager

Enclosures