



Oregon

Tina Kotek, Governor

Department of Environmental Quality
Agency Headquarters
700 NE Multnomah Street, Suite 600
Portland, OR 97232
(503) 229-5696
FAX (503) 229-6124
TTY 711

September 29, 2023

Hollingsworth & Vose Fiber Company
1551 Crystal Lake Drive
Corvallis, OR 97333
Sent via email only

Anita Ragan,

Hollingsworth & Vose Fiber Company (H&V) was called in to Cleaner Air Oregon (CAO) on January 10, 2022. DEQ approved the CAO Emissions Inventory (Inventory) on June 13, 2023. H&V submitted a CAO Modeling Protocol (Protocol) on July 13, 2023, and a Risk Assessment Work Plan (Work Plan) on August 10, 2023. DEQ has completed an initial review of the Protocol and Work Plan and is responding with the following comments and requests.

General Comments

H&V's Inventory includes glasswool fibers (DEQ ID 352), a listed Toxic Air Contaminant (TAC) that does not currently have a Risk Based Concentration (RBC) under Oregon rules ([Oregon Administrative Rule \(OAR\) 340-245-8010 Table 2](#)). DEQ requests that the final Risk Assessment Report include a discussion of the uncertainty specifically associated with potential risk from emissions of glasswool fibers.

H&V has included natural gas combustion emissions for TACs with no site-specific source test data from the glass plant fiberizers (TEU NG_GP) as emissions that meet the criteria under the gas combustion exemption [OAR 340-245-0050\(5\)](#). While Toxics Emissions Units (TEUs) that solely combust natural gas are reported separately under [OAR 340-245-0050\(5\)\(a\)](#), they may only be excluded from determining compliance with Risk Action Levels (RALs) "if good air pollution control practices are followed to ensure proper combustion" per [OAR 340-245-0050\(5\)\(b\)](#). Source test and Continuous Emission Monitoring Systems (CEMS) data from the fiberizers has demonstrated that the combustion of natural gas from the fiberizers is not typical and has poor combustion characteristics. Therefore, TAC emissions from natural gas combustion from the fiberizers must be included in the source risk for the purpose of determining compliance with RALs in the final Risk Assessment Report.

Specific Comments

In accordance with [OAR 340-245-0030\(2\)](#), DEQ has determined that the following additional information and updates are required by **October 30, 2023** in order to approve the Protocol and Work Plan:

1. Submit the following additional information:
 - a. Documentation to support H&V's request that maintenance shop activities, including "a small amount of welding and use of various lubricants and greases," be designated as an Exempt TEU under [OAR 340-245-0060\(3\)\(a\)](#). Documentation should include, but may not be limited to, Safety Data Sheets for all products used, past usage data, assumptions used to determine maximum potential usage rates, and any calculations used to compare

usages against the thresholds listed in DEQ's [Cleaner Air Oregon Exempt TEU Reporting](#) document. DEQ will review this information before making a determination on the Exempt status of this TEU; and

- b. An updated version of the redacted Inventory supporting documentation (Attachment 2 of the May 26, 2023 Inventory submittal), correcting the discrepancies noted in DEQ's June 13, 2023 Inventory approval letter: the "percent off-specification make-up" for some raw materials and their corresponding emissions are inconsistent between the unredacted and redacted versions of the supporting documentation PDF files (specifically, see emissions for barium carbonate and zinc oxide in Tables 10, 15, 22, and 28). The unredacted version (Attachment 1 of the submittal) appears to be correct and consistent with the AQ520 form.
2. Submit the following additional information and revise the Protocol as needed:
- a. Describe any potential differences in operating scenarios which may impact the distribution of emissions among the Ceramic Filtration Unit (CFU) stacks. Indicate whether production will always be split evenly among stacks for a given fiber type (Rotary Fine, Rotary Coarse/Ultra Rotary Coarse, and Flameblown), and whether the emissions modeled from each stack represent the maximum potential emissions for that stack. If the emissions in the Protocol do not represent the maximum potential emissions for each stack, revise the Protocol to include these operating scenarios;
 - b. Describe any potential variation in physical parameters for the CFU stacks due to variable fan speeds or air flow rates, and describe how modeled stack flow rates and velocities were determined;
 - c. Update Table 4-4 and the meteorological data processing (if necessary) to use surface roughness parameters consistent with the existing land use for the 12 sectors surrounding facility's on-site meteorological station, rather than for surface data collected at an airport;
 - d. Update Section 3.4 and Tables 3-1, 3-2, and 3-6 to include a new emission point for fugitive emissions from the packaging area in Glass Plant 2, and apportion emissions from the BALING TEU between GP1_A, GP1_B, and the new emission point based on production rates for Glass Plant 1 and Glass Plant 2. DEQ acknowledges that H&V has asserted in the Protocol that fugitive emissions from baling are exclusive to GP1; however, for consistency with the emission estimates in Inventory (which are based on total facility fiber production), emissions should be apportioned between the two glass plant buildings;
 - e. Update Sections 3.1 and 3.11 to indicate that all risk from natural gas combustion for the fiberizers (TEU NG_GP) will be included in source risk for the purpose of determining compliance with RALs; and
 - f. It is recommended, although not required, that the information on Figure 4-10 be included on Figure 4-6 to illustrate the assigned exposure scenario for each receptor location.

DEQ is requesting that you submit additional information to complete your Protocol and Work Plan. If you think that any of that information is confidential, trade secret or otherwise exempt from disclosure, in whole or in part, you must comply with the requirements in [OAR 340-214-0130](#) to identify this information. This includes clearly marking each page of the writing with a request for exemption from disclosure and stating the specific statutory provision under which you claim exemption. Emissions data is not exempt from disclosure.

DEQ remains available to discuss this information request with you and answer any questions you may have. Failure to provide additional information, corrections, or updates to DEQ by the deadlines above may result in a violation of [OAR 340-245-0030\(1\)](#).

If you have any questions regarding this letter please contact me directly at (503) 866-9643 or Julia.degagne@deq.oregon.gov, and I look forward to your continued assistance with this process.

Sincerely,

A handwritten signature in cursive script that reads "Julia DeGagne".

Julia DeGagné
Air Toxics Project Manager

Cc: Cindy Frost, H&V
Chad Darby, Maul Foster Alongi
Amy DeVita-McBride, Maul Foster Alongi
Mike Eisele, DEQ
Owen Rudloff, DEQ
Mike Poulsen, DEQ
JR Giska, DEQ
Zach Loboy, DEQ
File