

March 14, 2024

Julia DeGagné
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232

**Re: Cleaner Air Oregon: Response to email dated February 23, 2024
Hollingsworth & Vose Fiber Company, Corvallis, Oregon**

Dear Julia:

Hollingsworth & Vose Fiber Company (H&V) received the email dated February 23, 2024 (the Email) from the Oregon Department of Environmental Quality (DEQ) accepting H&V's proposal to update the Cleaner Air Oregon (CAO) Emissions Inventory and modeling methodology. The DEQ requested updated versions of CAO submittals and supporting documents and additional documentation relating to H&V's on-site meteorological data collection by March 14, 2024. Specifically, the Email requested the following:

- Updated versions of the Emissions Inventory (AQ520), supporting calculations, Modeling Protocol and Risk Assessment Work Plan, as needed to reflect the changes proposed in H&V's letter to DEQ dated January 4, 2024 from H&V to the DEQ (the Letter).
- Copies of supporting calculations and modeling protocol tables in native excel format; and
- Any quarterly and/or final QA/QC reports associated with the on-site meteorological data collection that H&V has retained.

H&V and Maul Foster & Alongi, Inc. (MFA) have prepared the following submittals in response to the request.

Item 1 – Revised CAO Materials

As requested in the Email, MFA has prepared revised versions of all CAO deliverables. MFA has prepared two versions of the revised CAO emissions inventory and AQ520 form. The first version (Attachment A) includes all information and, as required by Oregon Administrative Rules (OAR) 340-214-0130, each page containing Confidential Business Information (CBI) is prominently marked as "Confidential Business Information – Do Not Release to Public." This version should not be released to the public. The other version (Attachment B) has all of the CBI redacted and is, therefore, suitable for public distribution. Both versions of the AQ520 forms (CBI and redacted) will be provided electronically to the DEQ. Revised versions of the CAO modeling protocol and risk assessment work plan are included as Attachments C and D, respectively.

H&V is requesting that portions of our response relating to certain proprietary raw material usage rates as well as Attachment A (in its entirety) be protected as confidential and exempt from public disclosure pursuant to OAR 340-214-0130 and Oregon Revised Statutes (ORS) 192.501(2). The pages of the materials eligible for this exemption from disclosure have been clearly marked with the words: Confidential Business Information--Do Not Release to Public. Consistent with the requirements in OAR 340-214-0130(3), these data (a) cannot be patented; (b) are known only to a limited number of individuals within H&V and the company makes efforts to maintain the secrecy of the information; (c) are information that derives significant economic value from not being disclosed to other persons; (d) provide H&V the chance to obtain and maintain a business advantage over its competitors which lack the information; and (e) do not constitute "emissions data" as that term is defined by state law. In short, the source, brand, and composition of the raw materials are at the core of H&V's highly competitive business and the disclosure of these data would have a profound negative impact upon H&V's ability to do business. Therefore, these data are precisely the type of trade secret information that ORS 192.501(2) and OAR 340-214-0130 are intended to protect. If the DEQ is unable or unwilling to exempt these data from public disclosure, we request that all copies of the data be returned to H&V immediately and we will work with you to provide the information you need by another means.

Revised Emissions Inventory

As outlined in the Letter, H&V proposes to assess risk for two Potential to Emit (PTE) production scenarios: the first with all rotary fiberizers assigned to production of Rotary Fine fiber (Scenario 1) and second with all rotary fiberizers assigned to production of Rotary Coarse fiber (Scenario 2). MFA prepared a revised emissions inventory incorporating updates to estimate emissions from these two theoretical production scenarios. The updates to the PTE emissions inventory include the following:

- Incorporation of production estimates for two glass fiber production scenarios using fiber type specific production rates.
- Incorporation of emission estimates from both Glass Plant and Ceramic Filtration Units for both production scenarios.
- Updates to the basis of the Baling emission estimate to the higher production rate for Scenario 2.

Revised Modeling Protocol and Risk Assessment Work Plan

MFA and H&V incorporated the proposed changes outlined in the Letter. MFA has updated the Modeling Protocol tables to reflect the updates to the emissions inventory and to present the proposed emission rates for the two production scenarios. No substantive changes have been made to the Risk Assessment Work Plan, but it has been updated to reflect the revisions to the Modeling Protocol.

Item 2 – CAO Supporting Data

MFA has prepared copies of both the emissions inventory and modeling protocol tables in their native excel format to aid in the DEQ's review. Both workbooks will be provided to the DEQ electronically. MFA considers the workbooks to contain formulas and conditional formatting that are trade secrets and is providing these as a courtesy to the DEQ. MFA does not grant permission for the release the workbooks in native format to the public and the workbooks will be password protected.

Item 3 – On-Site Meteorological Data

H&V is unable to provide quarterly and final QA/QC reports for the on-site meteorological station that was installed for the 2017 calendar year. Pursuant to OAR 340-214-0014, H&V is only required to retain monitoring data and supporting information for 5 years from the date of the measurement. The station was removed over 6 years ago and H&V has not retained copies of the quarterly and final QA/QC reports beyond the required timeframe. Given this information was provided to the DEQ at the time of the met station operation, and this data was approved by the DEQ for the PSD permit dispersion modeling, H&V has assumed that this data was valid and would not require further justification. H&V reached out to American Ecotech, the vendor who installed and maintained the on-site meteorological station, to retrieve copies of these calibration reports. American Ecotech retained only the initial, mid-year, and final calibration spreadsheets in Excel format demonstrating that the met station was collecting valid data throughout the year of service. H&V will provide the DEQ with the electronic copies of the initial, mid-year, and final calibration workbooks from American Ecotech. The workbooks will be provided electronically as Attachments E through G.

Please do not hesitate to contact me at (541) 738-5382 if you have any comments or require additional information.

Sincerely,



Anita Ragan
Environmental Health & Safety Manager

Attachments:

- A. CAO Emissions Inventory (Revision 6) – CBI, provided separately
- B. CAO Emissions Inventory (Revision 6) – Redacted, provided separately
- C. CAO Modeling Protocol (Revision 2), provided separately
- D. CAO Risk Assessment Work Plan (Revision 2), provided separately
- E. Initial Meteorological Station Calibration Workbook, provided separately
- F. Mid-Year Meteorological Station Calibration Workbook, provided separately
- G. Final Meteorological Station Calibration Workbook, provided separately

cc: Cindy Frost, H&V
Owen Rudloff, DEQ
J.R. Giska, DEQ
Mike Eisele, DEQ