

Department of Environmental Quality
Agency Headquarters

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June 20, 2024

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

Anita Ragan,

DEQ has reviewed and approves the Cleaner Air Oregon (CAO) Emissions Inventory, Modeling Protocol, and Risk Assessment Work Plan for Hollingsworth & Vose Fiber Company (H&V) in Corvallis, OR, all submitted on March 14, 2024, with the following comments.

Please address the following items with your Risk Assessment submittal:

- 1. As noted in DEQ's September 29, 2023, comment letter, include a discussion of the uncertainty specifically associated with potential risk from emissions of glasswool fibers in the final Risk Assessment Report.
- 2. In Table 4-3 of the Risk Assessment Work Plan, correct the footnotes that are incorrectly labeled: (a) and (b) should apply to the unlabeled footnotes, and the labeled footnotes should be renamed such that (a) becomes (c), and (b) becomes (d).
- 3. Update the Emissions Inventory AQ520 forms to include the following Toxics Emissions Units (TEUs) on Worksheet 2, "Emissions Units & Activities," and indicate that they are Exempt TEUs in the "Description" column emissions and activity data do not need to be included in the AQ520 for these TEUs:
 - a. Maintenance and repair shop product usage;
 - b. Maintenance and repair shop welding; and
 - c. Any diesel fuel storage tanks that H&V operates on site (for example, for the emergency generators). Please provide the maximum annual throughput, fuel type, and tank capacity so that DEQ can confirm that these qualify for exemption under Oregon Administrative Rule (OAR) 340-245-0060(3)(a).

The next step in the CAO process is to submit a Risk Assessment by no later than 120 days from the date of this letter, **by October 18, 2024**. [(OAR) 340-245-0030(1)(d)(ii)] Risk Assessment requirements are listed in OAR 340-245-0050.

Information about CAO permitting, including a flow chart showing the risk assessment process can be found on the CAO Step-by-Step Guide for Facilities webpage.

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,

Julia De Gagne

Julia DeGagné Cleaner Air Oregon Project Engineer

Cc: Cindy Frost, H&V

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