



# 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

January 17, 2025

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

Anita Ragan,

DEQ received the submittal of the Cleaner Air Oregon (CAO) Level 3 Risk Assessment for Hollingsworth and Vose Fiber Company (H&V) in Corvallis, OR on October 18, 2024, and has completed an initial review.

## General Comments

Exposure Type Designations: Exposure scenarios must be assigned to exposure locations based on allowable uses under local land use laws, except as allowed under [OAR 340-245-0210\(1\)\(a\)\(F\)](#) or when DEQ has sufficient information to determine that an area is being used in a manner contrary to its land use zoning. [[OAR 340-245-0020\(22\)](#)] The City of Corvallis Land Development Code potentially permits housing in some areas that are designated on the statewide zoning map as “commercial” or “industrial” – many of these areas have been assigned to the “worker” exposure scenario rather than the “residential” exposure scenario in the Risk Assessment. DEQ has reviewed the aerial imagery for receptors within the fine modeling receptor grid, where the highest risk levels are anticipated, and is not requiring revisions to receptors in these areas that are currently developed – that is, have commercial and industrial structures in place. However, due to the possibility of new development on tax lots that are currently undeveloped with no existing commercial or industrial structures, DEQ is requiring that H&V either 1) update the exposure scenario designations to include the potential for residential exposure; or 2) formally request that the land use zoning classification of these areas be excluded in determining chronic exposure locations by submitting an Exposure Location Change Request form. (see below in Specific Comment Item #1)

Modeling of Super Sack Filling Emissions: H&V proposed two modeling scenarios in the Modeling Protocol, based on different production activities: all rotary fine fiber production (Scenario 1) and all rotary coarse fiber production (Scenario 2). These scenarios were proposed to determine the worst-case scenario for assessing risk, and DEQ approved this approach in the Modeling Protocol. After reviewing the Risk Assessment modeling files, DEQ determined that the Super Sack Filling emissions (SSF TEUs) were not modeled according to these two scenarios. Instead, H&V assumed a “typical” production split of fibers to calculate emissions from the individual SSF TEUs, which affects the spatial distribution of both the amount and composition of emissions. DEQ performed an internal analysis to correct for modeling the distribution of emissions from these TEUs in accordance with both Scenario 1 and Scenario 2, and has concluded that neither of the results increase rounded cancer, noncancer chronic, or noncancer acute risk. Therefore, DEQ will not require H&V to revise the approved Modeling Protocol or the risk calculations for these TEUs. DEQ requests that H&V confirm the emissions used in this analysis. (see below in Specific Comment Item #2)

## Specific Comments

In accordance with [Oregon Administrative Rule \(OAR\) 340-245-0030\(2\)](#), DEQ has determined that the following additional information, corrections, and updates are required by **February 18, 2025**, in order to approve the Risk Assessment:

1. For the areas within the fine modeling grid (that is, the receptors with 50-meter spacing), review the City of Corvallis Land Development Code<sup>1</sup> and Official Zoning Map<sup>2</sup> and
  - a. Confirm that the exposure type associated with each receptor represents the current land use for areas where housing is permitted<sup>3</sup>;
  - b. Update the Risk Assessment by doing one of the following for undeveloped parcels (that is, tax lots that are not currently developed with buildings) where the proposed exposure type is not consistent with allowable land use under the zoning code – this should include, at a minimum, the areas shown in Attachment A:
    - i. Submit the [AQ521 Exposure Location Change Request Form](#) and [AQ522 Exposure Location Change Request Table](#) to request a different exposure classification; or
    - ii. Update the receptor classifications used in the Risk Assessment and Figure 4-6 (“Receptor Locations in the Immediate Area”) to residential exposure, and present updated risk results in Section 6 if necessary.
2. Review and confirm that the emissions and emission distribution among stacks presented in Tables 1 through 4 of Attachment B appropriately reflect the requested potential to emit for Scenario 1 and Scenario 2, including:
  - a. Under Scenario 1, the maximum amounts of Ceramic Filtration Unit (CFU) SSF waste would be 5,000 tons per year and 29.6 tons per day for rotary fine fibers and zero for rotary coarse fibers; and
  - b. Under Scenario 2, the maximum amounts of CFU SSF waste would be 5,000 tons per year and 29.6 tons per day for rotary coarse fibers and zero for rotary fine fibers.
3. Remove or revise the last sentence in Section 1, which states "Therefore, the facility is a de minimis source with respect to CAO permitting." While the calculated risk is below Source Permit Level, not all Toxics Emissions Units (TEUs) were evaluated at their capacity as required by [OAR 340-245-0050\(7\)](#) for de minimis designation under CAO; therefore, H&V cannot be designated a de minimis source as defined in [OAR 340-245-0020\(14\)](#).
4. In Tables 3-1 through 3-4, amend footnote (g) to note that the emissions from the Furnace Bin are released as fugitives from Glass Plant 1 (GP1 Fugitives) and emissions from Transport, Storage, and Mixing are released from the Raw Material Handling Area Baghouse (BBBH).
5. Correct the reference in Section 5-4 that refers to Section 4-6 for information on risk calculations – unit emission rates are described in Section 4-4.
6. The RBCs listed in Table 6-7 for residential chronic noncancer risk are instead residential cancer RBCs. The calculated risks are therefore incorrect. Update the calculations and results in Table 6-7, Table 6-2 and Section 6.2 as needed.
7. In Tables 6-2 and 6-6 and Section 6-1, update the risk from gas combustion TEUs for the residential cancer exposure scenario to “0.1” (rounded from 0.06).

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<sup>1</sup> <https://www.corvallisoregon.gov/cd/page/land-development-code>

<sup>2</sup> <https://www.corvallisoregon.gov/cd/page/official-zoning-map>

<sup>3</sup> Examples of such zoning designations in the Corvallis code may include: Mixed Use Transitional (MUT), Mixed Use Employment (MUE), General Commercial (GC), Commercial Mixed Use (CMU), Professional and Administrative Office (P-AO), central business fringe (CBF), and Oregon State University (OSU).

8. Correct the footnote for “Maximum Predicted Risk Exposure Location Per TEU” in Tables 6-4, 6-5, 6-6, and 6-7 – this should refer to Table 6-3 instead of Table 6-2.
9. Correct the footnote for “Maximum Predicted Risk Exposure Location Per TEU” in Tables 6-9 and 6-10 – this should refer to Table 6-8 instead of Table 6-7.
10. Correct footnote (b) in Tables 6-5 and 6-7 – it should refer to “Hazard Index” instead of “Risk (chances-in-1,000,000)”.

DEQ is requesting that you submit additional information to complete your Inventory. 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](mailto:Julia.degagne@deq.oregon.gov). I look forward to your continued assistance with this process.

Sincerely,



Julia DeGagné  
Cleaner Air Oregon Project Engineer

Enc: Attachment A: Figure showing undeveloped areas with potential residential use  
Attachment B: Super Sack Filling emissions, redistributed for Scenario 1 and Scenario 2

Cc: Chad Darby, Maul Foster Alongi  
Leslie Riley, Maul Foster Alongi  
Mike Eisele, DEQ  
Alex Haulman, DEQ  
J.R. Giska, DEQ  
Zach Loboy, DEQ  
File

**Attachment A.**

Figure showing DEQ-identified undeveloped areas within the fine modeling grid that have potential residential use and are currently assigned to the “worker” exposure scenario:

