

February 18, 2025

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

**Re: Cleaner Air Oregon: Response to letter dated January 17, 2025  
Hollingsworth & Vose Fiber Company, Corvallis, Oregon**

Dear Julia:

Hollingsworth & Vose Fiber Company (H&V) received the letter dated January 17, 2025 (the Letter) from the Oregon Department of Environmental Quality (DEQ) requesting edits to the Level 3 Risk Assessment (L3RA) that was submitted on October 18, 2024. H&V and Maul Foster & Alongi, Inc. (MFA) have prepared the following submittals in response to the request.

## **Item 1 – Revised CAO Materials**

MFA has prepared revised versions of all CAO reports to align with the updates requested in the Letter.

### **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 figures to reflect the updates to the zoning analysis and exposure classifications. 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.

### **Revised Risk Assessment Report**

MFA and H&V incorporated the proposed changes outlined in the Letter.

MFA has prepared a copy of the updated risk assessment tables in their native excel format to aid in the DEQ's review. This workbook will be provided to the DEQ electronically. MFA does not grant permission for the release the workbooks in native format to the public and the workbooks will be password protected.

## **Response to General Comments**

This document is organized in the same manner as the information was requested in the Letter. The Letter comments are shown in bold followed by the response.

## Response to Specific Comments

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 and
  - a. Confirm the exposure type associated with each receptor represents the current land use for area where housing is permitted.
  - 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.

MFA reviewed the City of Corvallis Land Development Code and Official Zoning Map, and the proposed land development code changes provided in the South Corvallis Area Plan by the City of Corvallis. The South Corvallis Area Plan can be accessed here: [South Corvallis Area Plan](#)<sup>1</sup>. MFA made the following updates to the receptor exposure type classifications:

- The receptor classifications for the areas shown in Attachment A have been updated from worker to residential.
- South Corvallis Area Plan—Area 9. Mixed use employment is proposed to be updated to mixed use residential. The exposure type has been updated from worker to residential.
- South Corvallis Area Plan—Area 12. Open space conservation is proposed to be updated to medium-high density residential. The exposure type has been updated from acute only to residential.
- South Corvallis Area Plan—Area 23. Mixed use commercial is proposed to be updated to mixed use residential. Exposure type has been updated from acute only to worker.

As noted in the Modeling Protocol, MFA ran the dispersion model using unit emission rates, which allows updates to a risk assessment without running additional models. MFA updated the risk assessments for Scenario 1, Scenario 2, and gas combustion TEUs to reflect the

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<sup>1</sup> <https://storymaps.arcgis.com/stories/c82829542f3a45e28ca7612290edb1da>

changes in zoning and the associated exposure classifications. No changes to the dispersion model were necessary, so the modeling files submitted to the DEQ on October 15, 2024 are valid for these updated assessments.

- 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.**

H&V agrees that the emission distribution in Tables 1 through Table 4 of Attachment B appropriately reflects the potential to emit for Scenario 1 and Scenario 2. According to the Letter, the DEQ determined the emission distribution in Attachment B does not increase rounded cancer, noncancer chronic, or noncancer acute risk estimates for either scenario. Therefore, the DEQ is not requiring H&V to revise the risk calculations for these TEUs.

Under Scenario 1, the CFU SSF waste will be 5,000 tons per year and 29.6 tons per day for rotary fine fibers and zero for rotary coarse fibers. Under Scenario 2, the CFU SSF waste will 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).**

The last sentence in Section 1 of the risk assessment report has been removed as requested.

- 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).**

Footnote (g) in Tables 3-1 through 3-4 of the risk assessment report has been updated as requested.

- 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.**

The reference in Section 5.4 that refers to unit emission rates has been updated to 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.**

The RBCs listed in Table 6-7 have been corrected.

- 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).**

The risk from natural gas combustion TEUs for residential cancer exposure has been rounded up to 0.1 from 0.06 in Table 6-2, Table 6-6, and Section 6.1 in the risk assessment report.

- 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.**

Footnote (3) in Table 6-4 and Table 6-6, and footnote (4) in Table 6-5 and Table 6-7 has been updated to refer to Table 6-3.

- 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.**

Footnote (3) in Table 6-9 and footnote (4) in Table 6-10 has been updated to refer to Table 6-8.

- 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)”.**

Footnote (b) in Tables 6-5 and 6-7 has been updated to refer to Hazard Index.

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 Modeling Protocol (Revision 3), provided separately  
                             B. CAO Risk Assessment Risk Plan (Revision 3), provided separately  
                             C. CAO Risk Assessment Report (Revision 2), provided separately

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