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March 2, 2020

Sarah France
EHS Manager
The Willamette Valley Company LLC
P.O. Box 2280
Eugene, OR 97402

Re.: Cleaner Air Oregon (CAO) Call-in

Ms. France:

This letter provides written notice to you in accordance with OAR 340-245-0050 that The Willamette Valley Company LLC, LRAPA Source Number 208935, has been called in to the Cleaner Air Oregon program.

Governor Kate Brown initiated the Cleaner Air Oregon program in 2016. The goal of CAO is to better understand emissions of toxic air contaminants and evaluate potential health risks to people near commercial and industrial facilities that emit regulated toxic air contaminants, communicate those results to affected communities, and if needed, reduce those risks to below health-based standards.

Your facility identified above must perform a risk assessment in accordance with the rules adopted by the Environmental Quality Commission (EQC). LRAPA is provided authority by the EQC to implement the CAO program in OAR 340-245-0010(3). This assessment will require you to provide information about current and potential emissions (e.g., production activities, emissions units, and control devices). This information will be used in conjunction with other data about where your facility is located to estimate risks to the surrounding community as required under Oregon Administrative Rules [\(OAR\) 340-245-0050\(1\)\(a\)](#):

(a) When notified in writing by [LRAPA], at [LRAPA's] discretion, the owner or operator of an existing source with an operating permit must either demonstrate that it is an exempt source or:

(A) Assess risk from the source using any of the Level 1 through Level 4 Risk Assessment procedures in sections (8) through (11);

(B) Assess risk from the source using the emissions inventory submitted under OAR 340-245-0040(1); and

(C) Follow the applicable calculation procedures under OAR 340-245-0200.

Next Steps:

1. Submit the CAO Pre-Application Fee form ([AQ100CAO](#)) with payment of the Call-In Fee by April 1, 2020, as identified in [OAR 340-245-0400\(3\)](#). The CAO Call-In fee associated with your Simple Low Permit is \$1,000.
2. Submit the CAO Emissions Inventory Form ([AQ405CAO](#)) by 5pm on June 1, 2020, as required under [OAR 340-245-0030\(1\)\(a\)](#). For most facilities, this emissions inventory will be more detailed than the toxic air contaminant emissions inventory submitted in 2017 because it will include information about maximum daily emissions as well as annual average emissions. If you wish to complete additional testing, this may affect submittal deadlines.

LRAPA will need to be able to verify the information submitted in your Emissions Inventory. In order for LRAPA to be able to approve your submission, please be sure to provide all supporting documents, including emissions factors and calculation methods. LRAPA will consider submissions incomplete if submitted without supporting information.

With the exception of the LRAPA form (AQ100CAO) mentioned above, information about CAO permitting and a flow chart showing the risk assessment process can be found on the "Cleaner Air Oregon Risk Assessment Process and Forms" tab at <https://www.oregon.gov/deq/aq/aqPermits/Pages/CAO-reg.aspx>.

LRAPA is available for consultation prior to reviewing and approving information submittals for the CAO permitting process, including the Emissions Inventory, Modeling Protocol, Risk Assessment Work Plan (if you plan to complete a Level 3 or Level 4 risk assessment) and the Risk Assessment itself. Once the risk assessment is complete and approved, the Risk Action Levels in [OAR 340-245-8010](#) determine whether additional action is required.

Your contact for CAO risk assessment work is:
Katie Eagleson, Environmental Engineer
541-736-1056, ext. 233
katie@lrpa.org

Please contact LRAPA to clarify any questions you may have regarding the emissions inventory and risk assessment process. We look forward to working with you.

Sincerely,



Max Hueftle, P.E., BCEE

Permit Section Manager
(541) 736-1056, ext. 231
Email: max@lrpa.org

Cc: Merlyn Hough, LRAPA Director
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