



May 20, 2022

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## **Updates on facilities progressing through Cleaner Air Oregon**

The Lane Regional Air Protection Agency has updated the progress of facilities moving through the Cleaner Air Oregon program. Below is a brief description of the updates. View relevant documents and full details by visiting each facility's specific webpage.

### **Arcimoto, Inc.**

<https://www.lrapa.org/347/Arcimoto-Inc>

On November 5, 2021, LRAPA received an application for a Simple Air Contaminant Discharge Permit (ACDP) and an initial CAO application from Arcimoto, Inc. As a new facility in Lane County, Arcimoto was required to submit a completed CAO risk assessment prior to being issued an ACDP.

LRAPA reviewed Arcimoto, Inc.'s application materials submitted on November 5, 2021, which included a CAO Modeling Protocol and a Risk Assessment Report. LRAPA reviewed the Emission Inventory calculations provided on January 19, 2022, as well.

The facility performed a Level 1 Risk Assessment, which is the lowest level of risk assessment, meaning it requires less sophisticated computer modeling of air toxic emissions but has the most conservative assumptions when determining risk. Because Level 1 Risk Assessment calculations are less complex, they overestimate potential health risk.

Following LRAPA's review and feedback on Arcimoto, Inc.'s original CAO documentation, LRAPA received updated materials which were approved by LRAPA on April 25, 2022.

On Wednesday May 25, 2022, LRAPA intends to place Arcimoto, Inc.'s draft Simple ACDP on Public Notice. This permit will be open to public review and comment for 30 days.

### **Emerald Forest Products, Inc. Plant #1 (EFP#1)**

<https://www.lrapa.org/346/Emerald-Forest-Products-Inc-Plant-1>

EFP#1 submitted a completed Emissions Inventory with CAO form AQ520 on its due date of April 15, 2022. LRAPA is currently reviewing EFP#1's emissions inventory. Once approved, the facility will enter the Modeling Protocol and Risk Assessment phase of CAO.

### **Hexion**

<https://www.lrapa.org/329/Hexion-Inc>

Hexion submitted a completed Emissions Inventory with the CAO form AQ520 on its due date of December 10, 2021. LRAPA reviewed the submitted information and requested modifications and clarifications on March 7, 2022, and March 11, 2022. LRAPA expects a response to these requests by June 1, 2022.

### **J.H. Baxter & Co. (JHB)**

<https://www.lrapa.org/327/JH-Baxter-Co---Eugene-Plant>

Two public meetings on JHB were held virtually to update interested community members and media on regulatory efforts around the facility.

The [first public meeting](#) took place on February 17, 2022. The Active Bethel Community neighborhood association (ABC) hosted a public meeting on JHB to provide the Oregon Department of Environmental Quality (DEQ) the opportunity to explain and discuss the results of the 2021 soil sampling of residential properties located near the facility. Soil samples analyses indicated elevated levels of dioxins in some residential properties which require cleanup efforts.

A [second public meeting](#) was hosted by the Oregon Health Authority (OHA) on March 1, 2022, and communicated potential health risks based on the levels of dioxins in soil samples collected from residential properties in 2021. OHA described how health risk is determined, highlighted the main pathway of dioxin exposure is through ingesting soil, and detailed steps residents requiring cleanup efforts may take to minimize exposure from elevated levels of dioxins in the soil on their property.

On March 28, 2022, JHB submitted a letter to LRAPA requesting permission to discontinue PID (photoionization detector) monitoring of the carbon adsorption unit (CAU) and turn off the CAU fan. The CAU and CAU fan is a pollution control system designed to adsorb/capture air toxic emissions from the facility's wood treatment process in the activated carbon unit before being venting to the atmosphere. The required PID monitoring verifies the effectiveness of this pollution control system. Because JHB is no longer conducting wood treatment activities, the facility requested permission to stop the CAU fan and the PID monitoring of the CAU, as required by their air permit. LRAPA approved this request on April 29, 2022.

On April 20, 2022, JHB requested a second 3-month extension for a source test report originally due on February 8, 2022. The report includes data from source testing of the carbon adsorption unit, pentachlorophenol stack, and permanent total enclosure verification testing conducted in December 2021. (Source testing, aka “stack testing”, is a process that directly measures air emissions from point sources throughout a facility. This type of testing is useful in estimating the type and quantity of emissions more accurately.) JHB again cited an inability to pay for the development of the lab testing report as justification for an extension.

After checking with the contractor who conducted the December 2021 source testing to assure the lab analysis was completed on samples taken and only the report needed to be developed, LRAPA conditionally approved the extension request. The added conditions to this approval are, in short, JHB must not conduct any oil-based or waterborne wood preservation activities or operate any of their retorts for any reason, activity, or purpose. Also, JHB may not operate any work tanks, railcar agitation/recirculation and unloading equipment, or maintain any treated storage.

These conditions are intentionally specific and more complete than LRAPA’s prior conditional approval which stated: “JHB must not resume operations of any wood preservation activities.”

The new deadline for submitting the December 2021 source testing results is August 9, 2022.

**Willamette Valley Company, LLC (WVCO)**

<https://www.lrapa.org/330/The-Willamette-Valley-Company-LLC>

On May 13, 2022, WVCO submitted their Level 1 Risk Assessment Report, which was due to LRAPA no later than May 17, 2022. A Level 1 Risk Assessment is the lowest level of risk assessment, meaning it requires less sophisticated computer modeling of air toxics emissions but has the most conservative assumptions when determining risk. Because Level 1 Risk Assessment calculations are less complex, they overestimate potential health risk. LRAPA is in the process of reviewing WVCO’s Level 1 Risk Assessment Report.

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