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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.

### **Hexion, Inc.**

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

Hexion requested a second extension on their Emissions Inventory due date because the US EPA extended the due date for Hexion's completion of its Toxics Release Inventory (TRI) new owner audit report. TRI tracks the management of certain toxic chemicals that may pose a threat to human health and the environment. U.S. facilities in different industry sectors must report annually how much of each chemical is released to the environment and/or managed through recycling, energy recovery and treatment. Data from Hexion's TRI will be included in their CAO Emissions Inventory.

Hexion's extension request would allow the facility more time to refine their CAO Emissions Inventory. This refinement will include: (1) liquid sampling to determine more representative concentrations of regulated toxic air pollutants in their processes; (2) refining systems which track material movement throughout the plant and identify potential points where emissions are released which will be included in the emissions inventory and will inform following CAO steps; and (3) a comprehensive update of calculations used to estimate emissions from storage tanks, including a detailed review of tank characteristics and parameters to assure they're consistent with updated emission calculation methodologies.

After confirming that US EPA has extended the due date for the TRI new owner audit report, LRAPA granted a second extension of the submittal date of the Emission Inventory. LRAPA informed Hexion they must review any test protocols with LRAPA to ensure the results will be acceptable under the CAO program. Hexion's new deadline for the facility's Emissions Inventory is December 1, 2021.

**The Willamette Valley Company, LLC**

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

LRAPA's review of the Willamette Valley Company's emission inventory drew questions and a need for clarification. Additional information requested by LRAPA was submitted by the facility and the updated Emissions Inventory underwent a second review. After this review LRAPA has need for additional information which includes, but is not limited to: (1) inconsistencies between tank opening sizes reported in the Emissions Inventory versus LRAPA observations during site visits; (2) discrepancies between assumptions used for emission calculations versus observed practice at the facility; (3) justification for the use of specific inputs in some equations that estimate emissions; (4) request spreadsheets that demonstrate how certain values used in the Emissions Inventory calculations were established; (5) and set clear expectations for temperatures used in calculations which help determine both daily and yearly emissions. LRAPA also identified a list of errors in the emissions inventory file that will need to be addressed and/or corrected by the facility.

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