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Updates on facilities progressing through Cleaner Air Oregon

The Lane Regional Air Protection Agency (LRAPA) 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/air-quality-protection/permitting-lane-county-sources/cleaner-air-oregon/arcimoto/>

On May 25, 2022, LRAPA placed Arcimoto, Inc's draft Simple Air Contaminant Discharge Permit (ACDP) on Public Notice. The permit was open for public review and comment for 30 days. No comments were received by LRAPA over the public comment period. LRAPA issued the Simple ACDP to Arcimoto, Inc. on July 1, 2022. The expiration date for this permit is July 1, 2027.

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

<https://www.lrapa.org/air-quality-protection/permitting-lane-county-sources/cleaner-air-oregon/cao-emerald-forest-products/>

EFP#1 submitted a completed emissions inventory to LRAPA 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, Inc.

<https://www.lrapa.org/air-quality-protection/permitting-lane-county-sources/cleaner-air-oregon/cao-hexion/>

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, March 11, 2022, and October 28, 2022. LRAPA has received the responses to these requests and expects to approve the Emission Inventory in

January 2023. Once an emissions inventory is approved by LRAPA, the facility will progress into the modeling protocol and risk assessment portion of Cleaner Air Oregon.

International Paper (IP) – Springfield Mill

<https://www.lrapa.org/air-quality-protection/permitting-lane-county-sources/cleaner-air-oregon/cao-international-paper-springfield-mill/>

International Paper has not yet been called into Cleaner Air Oregon. However, LRAPA intends to call the facility into Cleaner Air Oregon following the issuance of a renewal and modification of the facility's current Title V permit. LRAPA anticipates placing the draft permit renewal and modification on public notice sometime during the first quarter of 2023.

J.H. Baxter & Co. (JHB)

<https://www.lrapa.org/air-quality-protection/permitting-lane-county-sources/cleaner-air-oregon/cao-j-h-baxter/>

J.H. Baxter & Co. shuttered its facility in January of 2022. Since then, the facility has not conducted any wood treatment activities or made use of the facility's retorts. JHB remains in the emissions inventory phase of Cleaner Air Oregon. Data from source testing conducted at the facility in late 2021 has not been received by LRAPA as the facility claims an inability to pay the third-party company that conducted the source testing for their costs, and the testing company will not release the test data until their costs are recovered. It is unlikely the facility will progress further through Cleaner Air Oregon due to the facility's non-operating status.

JHB's active Standard Air Contaminant Discharge Permit (ACDP) expires on June 7, 2023. By LRAPA's rules, a facility with a Standard ACDP must submit a permit renewal application no later than 180 days before the permit expiration date. On December 7, 2022, JHB applied for a Simple ACDP in lieu of maintaining the Standard ACDP. Simple ACDPs are less costly, less complex, and require less time to permit and inspect than those required to obtain a Standard ACDP. Facilities on Simple ACDPs also are not allowed to maintain their Baseline Emission Rate and/or Netting Basis, so the Simple ACDP issuance would remove JHB's actual emissions from operations that occurred during the 1978 baseline year.

The JHB Simple ACDP would only allow operation of the remaining air contaminant sources on site, which are a natural gas-fired boiler (EU-3) that provides steam to the evaporator needed to maintain the facility's process water and water treatment system (EU-5). Even though there is no production activity onsite, the water treatment system must be maintained by the facility to evaporate rainwater that falls on the former production area, collects in the tank and other containments, and comes into contact with small amounts of preservation solution formerly

present in those containment areas from when the facility preserved wood. The Simple ACDP will remove all the waterborne and oil-based wood preservation activities (EU-1), the lumber drying activities (EU-2), and the wood working activities (EU-4). LRAPA plans on placing the draft Simple ACDP for JHB on public notice sometime in the first quarter of 2023.

Seneca Sustainable Energy, LLC (SSE)

<https://www.lrapa.org/air-quality-protection/permitting-lane-county-sources/cleaner-air-oregon/cao-seneca-sustainable-energy/>

On June 3, 2022, LRAPA placed Seneca Sustainable Energy, LLC draft TitleV Operational Air permit renewal and modification on Public Notice. This public comment period was extended from the standard 35 days required by LRAPA’s rules to a total of 51 days following the substantive request for a longer public notice period from the environmental advocacy group Beyond Toxics and the local neighborhood association Active Bethel Community. Their request was to allow the public additional time to review the draft permit and submit public comments.

On July 11, 2022, LRAPA held a hybrid in-person and virtual public hearing for the facility’s permit renewal and modification. 84 comments were submitted to LRAPA through this public process. LRAPA made one modification to the facility’s permit based on comments submitted to the agency.

LRAPA issued the Title V operating permit to SSE on September 20, 2022. The expiration date for this permit is September 20, 2027.

Willamette Valley Company, LLC (WVCO)

<https://www.lrapa.org/air-quality-protection/permitting-lane-county-sources/cleaner-air-oregon/cao-willamette-valley-company/>

On May 13, 2022, WVCO submitted their Level 1 Risk Assessment Report. 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 reviewed the Level 1 Risk Assessment Report and approved it on June 1, 2022.

On August 19, 2022, LRAPA placed WVCO’s Simple ACDP on Public Notice to begin a 35-day public comment period. No comments were submitted on the draft permit, and it was issued on September 23, 2022. The expiration date for this permit is September 23, 2027.

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