



August 24, 2023

**E-mail**

Doug Maples  
Vice President of Plywood Manufacturing  
Emerald Forest Products, Plant #1  
P.O. Box 2746  
Eugene, OR 97402

Re: Cleaner Air Oregon Modeling Protocol and Risk Assessment Work Plan

Dear Doug Maples:

LRAPA has completed the review of the Cleaner Air Oregon Modeling Protocol (MP) and Risk Assessment Work Plan (RAWP) submitted by the facility on July 5, 2023, for Emerald Forest Products – Plant #1 (EFP1- Source Number 202528).

In general, LRAPA agrees with the approaches proposed in the MP/RAWP for the facility. During our review of the information received, we found some residences that were not adequately captured by the receptor grid and/or receptor designations. LRAPA has proposed a list of receptors that should be changed to residential receptor types, and locations where residential receptors should be added. An Excel file with requested receptor revisions is attached to this letter. Please note that LRAPA reserves the right to further refine the classification of exposure locations based upon the results of the air quality modeling.

LRAPA is also requesting that EFP1 correct a minor error in section 3.3 of the MP/RAWP. The windrose is correctly identified as being from the Eugene Airport in the image (figure 3-4) but is erroneously listed as coming from the KPDX data set, instead of KEUG.

Please revise the MP/RAWP document and resubmit along with an updated receptor crosswalk by September 8, 2023.

Please let us know if you need any further information or assistance, or if you would like to meet to discuss. Failure to provide additional information, corrections or updates required by LRAPA may result in a violation of [OAR 340-245-0030\(1\)](#). LRAPA appreciates EFP1's efforts in complying with Cleaner Air Oregon.

Sincerely,

Steven A. Dietrich  
Director

cc: Kent Norville, Bridgewater Group (e-mail)  
DJ Burrows, PBS Environmental (e-mail)