



June 1, 2022

E-mail

Sarah France
Director of Regulatory Affairs
The Willamette Valley Company, LLC
P.O. Box 2280
Eugene, OR 97402

Re: Approval of Cleaner Air Oregon Risk Assessment (CAO RA)

Dear Sarah France,

Lane Regional Air Protection Agency (LRAPA) has completed the review of the Level 1 Risk Assessment submitted on May 13, 2022 by The Willamette Valley Company in Eugene, Oregon as part of the Cleaner Air Oregon (CAO) program. LRAPA concludes that the Level 1 Risk Assessment is complete and satisfies the CAO requirements for performing a risk assessment pursuant to OAR 340-245-0050. The results of the risk assessment demonstrate that the facility has an Acute Hazard Index (HI) risk above the Source Permit Level of 0.5 and the facility will require toxic air contaminant permit conditions.

The next step in the CAO review process is for The Willamette Valley Company to submit an application for a Toxic Air Contaminant Permit Addendum (TACPA) using Form AQ501 (<https://www.lrapa.org/DocumentCenter/View/4452/AQ501-CAO-Application?bidId=>) as required under OAR 340-245-0100 and submit the appropriate fee under LRAPA section 37-8030, Table 3. Because The Willamette Valley Company conducted a Level 1 Risk Assessment and the results of that risk assessment demonstrate that a permit amendment is required, the fee for a source holding a Simple ACDP is \$1,500. The TACPA application and the appropriate fee must be submitted to LRAPA no later than July 1, 2022. As part of the TACPA submittal, The Willamette Valley Company is encouraged to provide suggested language to limit the facility risk and/or emissions, as applicable.

Please contact LRAPA with any questions or clarifications regarding this letter. I can be contacted directly at either (541) 736-1056 ext. 233 or katie@lrapa.org. Failure to provide additional information, corrections or updates required by LRAPA may result in a violation of OAR 340-245-0030(1). LRAPA appreciates the efforts of The Willamette Valley Company in complying with Cleaner Air Oregon.

Sincerely,

Kathleen H Eagleson

Katie Eagleson, PE
Environmental Engineer

Cc: Meagan Tkach, The Willamette Valley Company (via email)
Max Hueftle, LRAPA (via email)
Andrew Rogers, Maul Foster & Alongi, Inc. (via email)