



July 24, 2024

**Email**

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

Re: LRAPA Approval of Cleaner Air Oregon Risk Assessment

Dear Doug Maples:

Lane Regional Air Protection Agency (LRAPA) has completed the review of the Level 3 Risk Assessment submitted on February 29, 2024 by Emerald Forest Products, Plant #1 (EFP1) in Eugene, Oregon as part of the Cleaner Air Oregon (CAO) program. LRAPA concludes that the Level 3 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 excess cancer risk less than or equal to the Source Permit Level of 5 for an existing source. The results of the risk assessment demonstrate that the facility has a Noncancer Hazard Index (HI) risk above the Source Permit Level of 0.5 less than or equal to the Community Engagement Level of 1 for the acute scenario at an existing facility. EFP1 will require a Toxic Air Contaminant Permit Addendum (TACPA).

The next step in the CAO review process is for EFP1 to submit an application for a TACPA as required under OAR 340-245-0100 using [Form AQ501](#) and be prepared to submit the appropriate fee under LRAPA section 37-8030, Table 3. Because EFP1 conducted a Level 3 Risk Assessment and the facility is not de minimis under CAO, the fee for a source that holds a Standard Air Contaminant Discharge Permit is \$11,300. The TACPA must be submitted to LRAPA no later than August 23, 2024. **LRAPA will invoice the facility for the CAO fee once the TACPA application is received.**

Please contact LRAPA with any questions or clarifications regarding this letter. 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,

Max Hueftle, P.E., BCEE  
Operations Manager

Cc: DJ Burrows, PBS Eugene (via email)  
Kent Norville, Bridgewater Group (via email)