



April 15, 2021

E-mail

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

Re: Response to Additional Information Request for Cleaner Air Oregon Emissions Inventory

Dear Sarah France:

LRAPA has reviewed the response letter received on March 31, 2021 regarding the request for additional for information for the facility's Cleaner Air Oregon Emissions Inventory, which was sent to the facility on February 11, 2021. Overall, LRAPA approves of the responses and agrees with the approaches mentioned to address concerns over emissions estimations. Two items from the response letter are discussed below:

Item 7: The referenced Attachment 1 includes information for one baghouse-style dust collector, which lists a 99.9% efficiency, and one cartridge-style dust collector that lists a MERV 15 efficiency rating. MERV 15 control efficiency can range anywhere from 85-95%, depending greatly on particle size. LRAPA is requesting that a method be proposed by the facility to estimate the particulate size distribution in order to make a sound engineering estimate for the dust collector control efficiency.

Item 19: The Cleaner Air Oregon Emissions Inventory Excel file with in-cell calculation equations will be kept as CBI per the request of the facility. In agreeance with the 2-week timeline proposed in the response letter, an electronic version of the emissions inventory with in-cell calculations must be submitted to LRAPA by **April 30, 2021**.

Please let me know if you would like to discuss either of these items in further detail. We appreciate your continued efforts to develop an accurate and representative emissions inventory.

Sincerely,

Kathleen H Eagleson

Katie Eagleson, PE
Environmental Engineer

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