



December 22, 2021

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 Emissions Inventory (CAO EI)

Dear Sarah France,

Lane Regional Air Protection Agency (LRAPA) has completed the review of the emissions inventory information submitted by The Willamette Valley Company in Eugene, Oregon as part of the Cleaner Air Oregon (CAO) program.

The Willamette Valley Company was called into the CAO program on March 2, 2020. The initial Cleaner Air Oregon Emissions Inventory (CAO EI) submittal was received on June 22, 2020, after an extension request was approved by LRAPA on March 25, 2020. On July 6, 2020, LRAPA met with the facility to ask for additional information for the CAO EI and on July 17, 2020, The Willamette Valley Company submitted supplemental information.

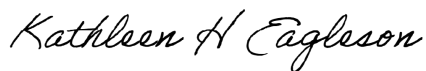
After extensive review of the updated CAO EI submitted on July 17, 2020, LRAPA sent a letter asking for additional information and clarifications for the CAO EI on February 11, 2021. The Willamette Valley Company submitted a CAO EI with the additional information requested by LRAPA on April 30, 2021. On June 28, 2021, LRAPA completed the review of the updated CAO EI submitted on April 30, 2021, and again asked for additional information and clarifications.

Following two extension requests, a meeting with The Willamette Valley Company on July 29, 2021, and a CAO rule update requiring the addition of emissions from emergency generators, LRAPA received a final version of the CAO EI from the facility on December 20, 2021. This version of the CAO EI accounts for all possible toxic air contaminant (TAC) emissions and estimates PTE emissions based on a ratio increase from actual throughput values from 2018 through 2020. In accordance with OAR 340-245-0210(1), this letter provides written notice to The Willamette Valley Company that LRAPA has reviewed and approves the CAO EI submitted in December.

The next step in the CAO review process is for The Willamette Valley Company to begin a risk assessment of the facility. The submittals required for the risk assessment are based upon the risk assessment level The Willamette Valley Company chooses to complete. Submittals required under the risk assessment process are listed in OAR 340-245-0030(b) through (d). The Willamette Valley Company has indicated to LRAPA the intention to complete a Level 1 Risk Assessment. Under a Level 1 Risk Assessment, The Willamette Valley Company must submit to LRAPA a modeling protocol no later than January 21, 2022. Modeling protocol requirements are listed in OAR 340-245-0210(1)(a).

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@lrpa.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 Willamette Valley Company's efforts in complying with Cleaner Air Oregon.

Sincerely,

A handwritten signature in cursive script that reads "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)