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February 23, 2022 **E-mail**

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

Re: Cleaner Air Oregon Modeling Protocol Submittal

Dear Sarah France:

LRAPA has completed a review of the Cleaner Air Oregon Modeling Protocol (CAO MP) submitted by The Willamette Valley Company, LLC on January 21, 2022. During the review of the information received, LRAPA cataloged the following list of items that will need clarification, additional information, or correction:

TEU ID	Comments
BUILDING_1 BUILDING_2	From elevation information gathered using Google Earth, the heights of both buildings are shorter than the listed height of 35 feet in Table 3-1 of the CAO MP. The LRAPA height estimates for these TEUs are as follows: • BUILDING_1: 6 meters (19.7 feet) • BUILDING_2: 8 meters (26.2 feet) Please verify the building heights of both TEUs, as a height below 20 feet would result in a change in the dispersion factors for that TEU.
BUILDING_1 BUILDING_2	Please verify the exhaust points for the three dust collectors at the facility. The CAO MP indicates that all three contribute to the fugitive emissions of these TEUs, but the Notice of Intent to Construct application received on May 6, 2021, for the installation of a third dust collector (EU#28) indicated that Dust Collector 1 (EU#1) exhausts to the atmosphere as a point source.
BUILDING_2	Table 3-3 of the CAO MP separates out the following compounds: • Toluene-2,4-diisocyanate → 4.6E-3 lb/yr • Toluene-2,6-diisocyanate → 1.1E-3 lb/yr • Toluene diisocyanates (2,4- and 2,6-) → 3.8E-4 lb/yr Only toluene diisocyanates (2,4- and 2,6-) has an RBC, but its yearly emission rate is listed as lower than the other speciated isomers. The toluene diisocyanates (2,4- and 2,6-) emission rate should be additive and include of all the toluene diisocyanates isomers. Please revise.

TEU ID	Comments
EGEN	Table 4-1 Dispersion Factors: • Non-Residential Child: Value not interpolated for a stack height of 8 feet, listed as the 5-foot stack dispersion factor • Non-Residential Worker: Value not interpolated for a stack height of 8 feet, listed as the 5-foot stack dispersion factor Please revise.
MDI_BULK RESIN_BULK	The dispersion factors in Table 4-1 for these TEUs do not appear to account for the correct stack height of 32 feet listed in Table 3-1, as the magnitudes of the dispersion factors listed in the CAO MP differ greatly from the factors for this stack height in OAR 340-245-8050 Stack Emission Dispersion Factors Tables 3A and 3B. Please verify stack height and revise.

The updated CAO MP and responses to the inquiries of this letter are due to LRAPA by **March 11, 2022.** LRAPA is available to discuss the items detailed in this letter to assure that all outstanding issues are adequately addressed prior to resubmittal. Please let me know if you need any further information or assistance.

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)