



Oregon

Kate Brown, Governor

Department of Environmental Quality

Agency Headquarters

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May 22, 2020

Karen (Lund) Chavez
Plant Engineer
Kingsford Manufacturing Company
3315 Marcola Road
Springfield, OR 97478

RE: Regional Haze Four Factor Analysis, Kingsford Manufacturing Company–Springfield, # 204402

Dear Karen:

Thank you for your letter dated January 24, 2020 regarding Round 2 (2021-2028) of the Regional Haze program and the requested four factor analysis for your facility located at 3315 Marcola Road in Springfield, Oregon (#204402).

As you may know, the Regional Haze Rule (40 CFR 51.308) was issued as part of the Clean Air Act on July 1, 1999. The goal of the Regional Haze program is to improve visibility conditions in Class I Areas back to natural conditions by 2064. Regional Haze is a long term program that sets goals for visibility improvement in 10-year periods of time from 2004 through to 2064, with interim checks on visibility conditions every 5 years. The letter we sent to you regarding four factor analysis on December 24, 2019, was in regard to the requirements for Round 2 of the Regional Haze program, as detailed in 40 CFR 51.308(f), for the period from 2021 to 2028.

In your January 24, 2020 letter, Kingsford requested DEQ reevaluate the visibility impacts from the Springfield facility based on the Plant Site Emission Limits (PSELs) contained in the Title V Operating Permit issued in August 2019 and confirm that the Springfield facility is not required to perform a four factor analysis for the Regional Haze program. In subsequent conversations with Kingsford and Lane Regional Air Protection Agency (LRAPA), DEQ stated that the Springfield facility could be excluded from conducting a four factor analysis for this round of the Regional Haze program if the Springfield facility was willing to accept a combined limitation on regional haze precursor PSELs and unassigned emissions such that a Q/d analysis based on the combined limitation resulted in a value of less than 5 at all Class I areas. In an April 16, 2020 email to DEQ and LRAPA, Kingsford agreed to a combined limitation on regional haze precursor PSELs and unassigned emissions of no more than 304 tons per year. Based on this agreement, DEQ concurs that Kingsford is not required to perform a four factor analysis for their Springfield facility during this round of the Regional Haze program.

	NO _x	SO ₂	PM ₁₀	Total (Q)	d (km)	Q/d
PSEL (Aug 2019 Permit)	103	39	103	245		4.02
PSEL + Unassigned Emissions (Aug 2019 Permit)		549		549	61.0	9.00
PSEL + Unassigned Emissions (Proposed)		304		304	61.0	4.98

Any permit changes related to the Regional Haze program will need to be federally enforceable by the July 31, 2021 submission date for the State Implementation Plan. DEQ has confirmed with EPA that this means

the combined limitation on Regional Haze precursor PSEs and unassigned emissions agreed to by Kingsford must be included in a final permit issued no later than June 30, 2021.

As discussed, Kingsford will submit a permit modification application for the updated PSEs to LRAPA by no later than August 1, 2020. If you fail to do so, DEQ will consider you out of compliance with the four factor analysis requirements as outlined in DEQ's letter to Kingsford dated January 8, 2020, and you may be subject to enforcement, including civil penalties.

Thank you again for your commitment to protecting air quality and visibility in Oregon's National Parks and Wilderness Areas. If you have any questions about the content of this letter or need technical assistance, please feel free to contact myself at wu.d@deq.state.or.us or 503-229-5269, and Jonathan Wright at jonathan@lrapa.org and 541-736-1056 x216.

Sincerely,



D Pei Wu, PhD
Air Quality Planning, Oregon Department of Environmental Quality

Cc: Michael. Orman, DEQ
Ali Mirzakhali, DEQ
Jonathan Wright, LRAPA
Max Hueftle, LRAPA
Merlyn Hough, LRAPA