

From: [DEGAGNE Julia * DEQ](#)
To: "Chad Darby"; [Ragan, Anita](#); [Leslie Riley](#)
Cc: [EISELE Michael * DEQ](#); [GISKA JR * DEQ](#)
Subject: RE: Hollingsworth & Vose Fiber Company - CAO 3/1/2023 Request Response
Date: Thursday, May 4, 2023 12:05:51 PM
Attachments: [image002.png](#)
[image003.png](#)
[AQ520_H&V_02-2173_Rev3_Redacted_DEQ.xlsx](#)
[CAO CFU Waste_DEQ_update_2023-05-01.xlsx](#)

Hello Anita, Chad and Leslie,

Thank you for putting these estimates together so quickly. We've reviewed the full Emissions Inventory (as submitted on 3/31/2023 and the "CAO CFU Waste" file provided) and have two updates to request prior to approving the EI:

1. CFU Discharge Filters: The metal TAC fraction of PM should be calculated relative to the actual measured total PM emissions from the 2018 source test reports instead of the maximum estimated PM emissions from the DEQ review reports. The review report emission factors represent the upper bound based on the ODEQ Method 5 quantitation limit, but this may underestimate the metal fraction in the PM. I've attached my calculations and an updated AQ520 (redacted version, with my edits highlighted in green) for your review. Please also update the actual production information in Tab 2 if needed.
2. Update the emission point crosswalk (Table A in the supporting calculations) to include baghouses L1BH and L2BH. I understand from the revised Glass Plant PFD (submitted April 6, 2023) and the combined PM emission factor used in Table 9 of the supporting calculations that a small portion of raw materials handling emissions is emitted as fugitives from Glass Plant 1, venting inside the building as described on page 26 of the Title V Permit Review Report. The AQ520 can be left as-is, but emissions should be split out accordingly in the modeling protocol.

Please review the attached information and provide the following **by Friday, 5/12/2023**:

- Revised AQ520 (redacted for public distribution), if you need to make any changes to the attached form;
- Unredacted revised AQ520 (not for public distribution);
- Revised supporting calculations in PDF or excel format.

If this won't be possible by next Friday, please let me know by Monday afternoon.

Thank you,



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