

May 26, 2023

Julia DeGagné
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232

Re: Response to email dated May 4, 2023

Dear Julia:

Hollingsworth & Vose Fiber Company (H&V) received your email dated May 4, 2023 (the email) relating to the Cleaner Air Oregon (CAO) Emissions Inventory submitted by H&V on March 31, 2023. H&V and Maul Foster & Alongi, Inc. (MFA) have prepared the following responses, due May 26, 2023 as agreed upon in email correspondence dated May 9, 2023. This response document is organized in the same manner as the information was requested in the email. The email comments are shown in bold followed by the response. MFA has prepared two versions of the revised CAO emissions inventory and AQ520 form. The first version (Attachment 1) includes all information and, as required by Oregon Administrative Rules (OAR) 340-214-0130, each page containing Confidential Business Information (CBI) is prominently marked as “Confidential Business Information – Do Not Release to Public.” This version should not be released to the public. The other version (Attachment 2) has all of the CBI redacted and is, therefore, suitable for public distribution. Both versions of the AQ520 forms (CBI and redacted) will be provided electronically to the DEQ.

H&V is requesting that portions of our response relating to certain proprietary raw material usage rates, specifically, Attachment 1 (in its entirety), be protected as confidential and exempt from public disclosure pursuant to OAR 340-214-0130 and Oregon Revised Statutes (ORS) 192.501(2). The pages of the materials eligible for this exemption from disclosure have been clearly marked with the words: Confidential Business Information--Do Not Release to Public. Consistent with the requirements in OAR 340-214-0130(3), these data (a) cannot be patented; (b) are known only to a limited number of individuals within H&V and the company makes efforts to maintain the secrecy of the information; (c) are information that derives significant economic value from not being disclosed to other persons; (d) provide H&V the chance to obtain and maintain a business advantage over its competitors which lack the information; and (e) do not constitute “emissions data” as that term is defined by state law. In short, the source, brand, and composition of the raw materials are at the core of H&V’s highly competitive business and the disclosure of these data would have a profound negative impact upon H&V’s

ability to do business. Therefore, these data are precisely the type of trade secret information that ORS 192.501(2) and OAR 340-214-0130 are intended to protect. If the DEQ is unable or unwilling to exempt these data from public disclosure, we request that all copies of the data be returned to H&V immediately and we will work with you to provide the information you need by another means.

CFU Discharge Filters: The metal toxic air contaminant (TAC) fraction of particulate matter (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.

Note, the name of this source has been changed. The source previously referred to as “CFU Discharge Filter” has been renamed “CFU Super Sack Filter.” H&V and MFA felt that the previous name did not clearly define the activity and was confused with CFU emissions generated from production activities at the Glass Plant.

MFA used the average of the 2018 source test results for actual measured total PM emissions to develop a ratio of metal TAC emissions to PM from Glass Plant sources. The ratio of TAC emissions to PM for Rotary Coarse/Ultra Rotary Coarse is calculated from the minimum of the Rotary Coarse and Ultra Rotary Coarse 2018 source test average results for actual PM emissions to develop a more conservative (higher) TAC to PM ratio.

MFA has incorporated DEQ’s proposed edits to the emission estimates for metal TAC emissions from the ceramic filtration unit (CFU) super sack filling activities. Emission factors for metal TACs from the CFU super sack filling were developed assuming the same ratio of metal TAC to PM from the Glass Plant sources and using the actual measured total PM emissions from the 2018 source tests. Emission estimates for silica were consistent with methodology presented in the previous version of the emissions inventory.

Along with the addition of the metal TAC emission estimates, MFA has also incorporated a revision to the particulate matter (PM) emission factor for the super sack filling operations. The previous version of the emissions inventory used an uncontrolled AP-42 emission factor, which has been replaced with an emission factor which accounts for the controls from the fabric filter.

Additionally, previously defined toxic emission unit (TEU) “CFU_SS” has been replaced by four new TEUs: SSF_RF, SSF_RC, SSF_FB, and SSF_GM. These four TEUs account for TAC emissions from super sack filling activities at CFUs controlling Rotary Fine, Rotary Coarse/Ultra Rotary Coarse, Flameblown, and Glass Melt production activities, respectively. Note, emissions calculations as presented overestimate TAC emissions from the super sack

filling activities as total waste collection throughput is used to estimate emissions from each TEU. Actual TAC emissions from this source would be much lower.

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.

At this time, H&V is evaluating options for add-on controls for Glass Plant 1 to filter fugitive particulate matter. We have therefore elected to postpone updates to Table A for these internally venting raw material sources. Emission points and emission allocations for raw material sources will be defined in the modeling protocol.

Additional edits to the emissions inventory incorporated with this revision include the following:

- Increase in the annual bulking agent silo filling hours of operation from 79.5 hours per year to 200 hours per year.
- Update to Raw Material Handling PM emission factor to reflect the reduction in the PM emission factor for the Lines 1 and 2 Furnace Bins. The updated emission factor accounts for a 50 percent reduction in PM emissions for sources venting inside a building, consistent with emission factors presented in the H&V's ACDP.
- Emissions for the Raw Materials Handling Off Specification Bin have been incorporated separately from the other Raw Material Handling sources. We have defined an additional TEU for the Off Specification Bin (RMH_OFF) and accounted for TAC emissions from the raw materials processed.

Please do not hesitate to contact me at (541) 738-5382 if you have any comments or require additional information.

Sincerely,



Anita Ragan
Environmental Health & Safety Manager



Attachments: 1. CAO Emissions Inventory (Revision 4) - CBI
 2. CAO Emissions Inventory (Revision 4) - Redacted

cc: Cindy Frost, H&V
 Mike Eisele, DEQ