



# Oregon

Kate Brown, Governor

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November 23, 2022

Conor Fox  
Bison Engineering, Inc.  
3143 E. Lyndale Ave.  
Helena, MT 59601  
*Sent via email only*

Conor Fox,

DEQ has reviewed the source test plan submitted by Bison Engineering on behalf of Hollingsworth & Vose Fiber Company (H&V) on November 13, 2022, for providing site specific emissions data from source testing as required in the September 22, 2022 letter to H&V. Based on our review, the source test plan is approved with the following comments.

### ***Test Method Specific Comments***

1. EPA Compendium Method TO-15
  - a. Method TO-15 is an ambient air test method and not a stack test method. EPA has informed States that TO-15 can not be used to demonstrate compliance with Federal emission standards from sources. TO-15 is also not listed as an approved test method for volatile organic compounds in the Oregon DEQ Source Sampling Manual.
  - b. DEQ will approve the use of TO-15 as a screening tool for determining if certain organic Toxic Air Contaminants (TACs) are present and approximate concentrations of those TACs.
  - c. For organic TACs detected at concentrations greater than 1 ppmv using TO-15, DEQ may require quantification using an approvable stack test method such as EPA Method 18.
2. EPA Method 204
  - a. Recording pertinent process details for each differential pressure measurement point. These records will include fan speed, fan damper position, baghouse operational parameters, and information about door positions as determined applicable for each measurement location.

Any modifications and/or alternatives to testing methods or procedures that are implemented to satisfy DEQ testing requirements must receive approval from DEQ prior to their use in the field. Changes not acknowledged by the DEQ could be the basis for invalidating an entire test run and potentially the entire testing program.

These testing results will provide valuable information regarding emissions from the facility. Please let me know if there are any changes to the schedule. If you have any questions or concerns, please contact me directly at 503-869-0054 or [thomas.rhodes@deq.oregon.gov](mailto:thomas.rhodes@deq.oregon.gov).

Sincerely,

*Thomas Rhodes*

Thomas Rhodes  
DEQ CAO Source Test Coordinator

Cc (via email):

Anita Ragan, Hollingsworth & Vose Fiber Company

Chad Darby, Maul Foster Alongi

Matt Davis, DEQ

Julia DeGagné, DEQ

Mike West, DEQ

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