

June 21, 2022

Julia DeGagne
Air Toxics Project Manager
Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232

Re: Request for Partial Extension

Dear Julia:

By letter dated June 8, 2022, the Oregon Department of Environmental Quality (DEQ) requested that Hollingsworth & Vose Fiber Company (H&V Fiber) respond to questions concerning its air toxics emissions inventory. We are actively working on responses and anticipate that for most of the questions we will have responses to you by your requested deadline of July 8. However, we request an extension on the responses to Question 9 and the portion of Question 10 relating to the TCE remediation system.

The TCE remediation system located H&V Fiber's property is there to address historic contamination completely unrelated to H&V Fiber's operations. H&V Fiber has never used TCE. The remediation is being overseen by DEQ's Cleanup Division which is expected to shortly issue a scope of work and remedial design/remedial action work plan through a Consent Judgment that will establish the long term control strategy. This Consent Judgment addresses the risk associated with the final remedy. Given that this cleanup order is imminent and that it shall establish the long term approach at the site, we are requesting an extension to responding to questions about the remediation until after the Department issues the pending Consent Judgment.

Consistent with our multiple past discussions about this topic, we do not believe that the TCE remediation system is appropriately part of the CAO analysis given that this system is not part of H&V Fiber's operations and is unrelated to the stationary source regulated by the CAO program. However, we recognize that this discussion may be best resolved once the Consent Judgment is issued and the remediation technology established with finality. For that reason we request an extension for our responses to the questions related to the TCE remediation system until 60 days after issuance of the Consent Judgment currently pending before DEQ.

Please contact me at (541) 738-5382 or Anita.Ragan@hovo.com with any questions.

Sincerely,



Anita Ragan

Environmental Health & Safety Manager

Attachments

cc: Cindy Frost, Hollingsworth & Vose Fiber Company
Tom Wood, Stoel Rives LLC
Chad Darby, Maul Foster and Alongi, Inc.