

Packaging Corporation of America
Salem Packaging
2121 Madrona Ave SE
Salem, OR 97302
Brent Wagner
General Manager



May 25, 2021

Delivered Electronically by E-mail

Kenzie Billings
CAO Project Manager
Oregon Department of Environmental Quality
700 NE Multnomah St., Suite 600
Portland Oregon 97232

Subject: CAO Submittal for PCA Salem Box Plant, AQ Source No. 24-8061

Dear Ms. Billings,

The Packaging Corporation of America's (PCA) Salem Box Plant was notified by letter dated September 1, 2020 that in accordance with OAR 340-245-0050, it had been called into the Cleaner Air Oregon program. This letter is PCA's response to your letter dated April 26, 2021 requesting additional information on the Combined Modeling Protocol and Risk Assessment Work Plan (Plan) by May 26, 2021. This submission included PCA's responses to comments 1-6.

We've provided the requested clarification and information requested below. For clarity, each comment from your letter is repeated, followed by our response. Maul Foster & Alongi, Inc. (MFA) will update the Modeling Protocol and Risk Assessment Work Plan (Plan) for submittal after the DEQ reviews and approves the supplemental information provided below.

1. *Please add a statement to Section 4.7 to clarify that receptors will be placed along the facility boundary.*

MFA has revised the Plan to include the requested statement.

2. *Please add a statement to Section 4.7 clarifying that receptors will be added beyond the edge of the current receptor grid (5 kilometers from the facility) if, at any receptor along the perimeter of the current receptor grid, risk exceeds the Source Permit Level, as recommended in Section 2.4 of DEQ's Recommended Procedures for Air Quality Dispersion Modeling.*

MFA has revised the Plan to include the requested statement.

3. *DEQ's understanding is that one roof vent was decommissioned and is not considered a source of toxic air contaminants – please provide supporting information to verify this.*

A building vent in the corrugator area is no longer in service. The vent fan and motor are disabled and there is a cover and panels over the vent maintained in a closed and sealed position to prevent rain from entering the building.

Note the decommissioned roof vent was formerly shown as VENT_5 in Figure 4-2 of the original Plan and was inadvertently included as a release point in the proposed model while active roof vent (located between VENT_8 and VENT_9) was not included. MFA has updated the Plan and Figure 4-2 accordingly to address this and submit with the revised Plan.

4. *Please provide an interior floor diagram and/or process flow diagram to support the statement that interior air is well mixed for both ink and glue emissions.*

The attached diagram shows the layout of the process areas within the building. The areas where gluing and printing are performed are completely open and undivided all the way up to the ceiling. There is no part of the main building that is isolated from another section of the main building, and the areas rely on the same ventilation system for air circulation and exchange. The building vents are part of the building ventilation system and are not connected to any specific equipment. Introduction of air into the building is through multiple open roll doors and windows. The building vent fans pull fresh air inside the plant creating mixing and movement throughout the building airspace, providing fresh air and cooling inside the plant and maintaining a balanced internal building working pressure. The ventilation system is designed to maintain a slightly negative pressure in the building and the roof vents are the only release point for building ventilation air.

5. *Tables 3-5 of the Plan notes specific locations in the building where these processes occur. DEQ would like clarification on the following:*
 - a. *Are there physical walls or barriers between these processes that may inhibit mixing?*
 - b. *Are the roof vents located above specific processes, such as glue and ink labeling?*

As shown in the attached diagram, there are walls along a portion of the corrugator area in the interior of the main building. Some of these walls extend from floor to ceiling while other sections are only ten feet high with open space above extending to the ceiling. And none of the walls extend for the entire length of the building. Therefore, there is no area within the main building that are isolated from others and ventilation air can move freely between different areas.

The building vent descriptions in Table 3-5 of the Plan refer to the general vicinity of processes within the building. The building vents are not designed or expected to vent emissions from the associated process areas. As noted above, the building vents are designed to provide general ventilation for the entire building and no individual vent is connected to any specific processes.

6. Please revise the following receptors to residential exposure location designation:

X	Y
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498671.5	4974049.5
498771.5	4973949.5
498671.5	4973949.5
498021.5	4972999.5
497971.5	4972999.5
497921.5	4972999.5

MFA will revise the identified receptors to residential exposure designation and will update the Plan to reflect the changes.

PCA will continue to work with DEQ and its technical resources to provide additional information as it becomes available in support of the review process.

If you have questions or need additional information, please contact Erica Frey-Hoyer at (503) 315-2335.

Sincerely,



Brent Wagner
General Manager

Cc: Erica Frey Hoyer

Enclosures: PCA Facility Map Rev 2019
PCA Modeling Protocol & RAWP
PCA Crosswalk of Receptors