



Oregon

Kate Brown, Governor

Department of Environmental Quality
Agency Headquarters
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April 26, 2021

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

Mr. Wagner,

The Oregon Department of Environmental Quality (DEQ) received the Combined Modeling Protocol and Risk Assessment Work Plan (Plan) dated March 18, 2021, submitted by the Packaging Corporation of America facility (PCA) in Salem, OR as part of the Cleaner Air Oregon (CAO) program. Based on our review, DEQ requests additional information, corrections and updates to the Plan, in accordance with Oregon Administrative Rule (OAR) 340-245-0210, by May 26, 2021.

Comments

1. Please add a statement to Section 4.7 to clarify that receptors will be placed along the facility boundary.
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.
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.
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.
5. Table 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 gluing and ink labeling?
6. Please revise the following receptors to residential exposure location designation:

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

Please contact me directly at (503.229.5247, billings.kenzie@deq.state.or.us) with any questions. We look forward to your continued assistance with this process.

24-8061 Packaging Corporation of America

Sincerely,

Kenzie Billings
DEQ CAO Project Manager

Cc: Erica Frey-Hoyer, PCA
Rich Garber, PCA
Claudia Davis, DEQ
J.R. Giska, DEQ
Brian Hall, DEQ
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File