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Updates on facilities progressing through Cleaner Air Oregon

The Lane Regional Air Protection Agency has updated the progress of facilities moving through the Cleaner Air Oregon program. Below is a brief description of the updates. View relevant documents and full details by visiting each facility's specific webpage.

J.H. Baxter & Co.

<https://www.lrapa.org/327/JH-Baxter-Co---Eugene-Plant>

Progress continues on J.H. Baxter & Co.'s emissions inventory. Preliminary source testing was conducted onsite by an independent, third-party contractor in September of 2021, with additional testing scheduled in December of 2021 so the facility can properly address stack access issues and meet required sampling conditions for EPA reference testing methods. Source testing, aka "stack testing", is a process that directly measures air emissions from point sources throughout a facility. This type of testing is useful in estimating the type and quantity of emissions more accurately.

On October 1, 2021, LRAPA responded to a set of questions asked by Beyond Toxics, a statewide environmental justice organization advocating for residence of west Eugene. Questions included requests for LRAPA to commit to information sharing; what level of oversight LRAPA will require during source testing; when, how, and what will be sampled during source testing; clarification of steps taken prior to source testing; methods used to establish emission inventories for varying emission sources at the facility; and a list of pollutants regulated under Cleaner Air Oregon for which the facility is required to test.

On October 21, 2021, the facility submitted the full lab report for all liquid sampling data collected in February, March, and June of 2021. Analysis of the samples was conducted by three independent third party laboratories.

On October 22, 2021, the facility submitted a revised source testing protocol for upcoming source testing of the carbon adsorption unit, pentachlorophenol stack, and permanent total enclosure (PTE) verification. This protocol details the precise methods and techniques used to

measure emissions from these emissions units at the facility. These revisions were initiated by LRAPA's internal review of the source testing protocol originally submitted by the facility on August 6, 2021.

On November 5, 2021, LRAPA approved the source testing protocol for the carbon adsorption unit, penta stack, and additional permanent total enclosure (PTE) verification. This source testing is scheduled for the week of December 6, or December 13, 2021.

On November 15, 2021, the facility submitted a cover letter and source test report for the ammoniacal copper zinc arsenate (ACZA) scrubber exhaust testing and permanent total enclosure (PTE) verification conducted on September 22 and 23, 2021. The results from this source testing will be implemented into the facility's emissions inventory to be used in future steps of Cleaner Air Oregon.

The documents associated with these updates are posted to LRAPA's facility specific webpage for J.H. Baxter. Navigate to the "Emissions Inventory" section to find these documents.

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