



LRAPA
Lane Regional Air Protection Agency

Certified Mail on 01/24/2024
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Springfield, OR 97477

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January 24, 2024

Certified Mail and E-mail

Nikita Kowal
Air Quality Engineer
International Paper Company, Springfield Mill
801 42nd Street
Springfield, OR 97478

Re: Cleaner Air Oregon (CAO) Call-in for Source No. 208850

Dear Nikita Kowal:

In accordance with [OAR 340-245-0050](#), this letter provides you with written notice that International Paper Company, Springfield Mill ("International Paper"), LRAPA Source Number 208850, has been called in to the Cleaner Air Oregon (CAO) program.

This CAO call-in action reflects LRAPA's and IP's agreement for your facility to be called into CAO at end of the permit renewal process that concluded with the issuance of the renewed Title V Operating Permit on January 23, 2024.

Governor Kate Brown initiated the CAO program in 2016. The goal of CAO is to better understand emissions of toxic air contaminants and evaluate potential health risks to people near commercial and industrial facilities that emit regulated toxic air contaminants, communicate those results to affected communities, and, if needed, reduce those risks to below health-based standards.

International Paper Company must perform a risk assessment in accordance with the rules adopted by the Environmental Quality Commission (EQC). LRAPA is provided authority by the EQC to implement the CAO program in [OAR 340-245-0010\(3\)](#). This assessment will require you to provide information about current and potential emissions (e.g., production activities, emissions units, and control devices). This information will be used in conjunction with other data about where your facility is located to estimate risks to the surrounding community as required under Oregon Administrative Rules [\(OAR\) 340-245-0050\(1\)\(a\)](#):

(a) When notified in writing by [LRAPA], at [LRAPA's] discretion, the owner or operator of an existing source with an operating permit must either demonstrate that it is an exempt source or:

(A) Assess risk from the source using any of the Level 1 through Level 4 Risk Assessment procedures in sections (8) through (11);

(B) Assess risk from the source using the emissions inventory submitted under [OAR 340-245-0040\(1\)](#); and

(C) Follow the applicable calculation procedures under [OAR 340-245-0200](#).

Next Steps:

1. Submit the CAO Pre-Application Fee form ([AQ500](#) and [Instructions](#)) with payment of the Call-In Fee by February 23, 2024, as identified in [OAR 340-245-0400\(3\)](#). The CAO Call-In fee associated with your Title V Operating Permit is \$10,000.
2. Submit the CAO Emissions Inventory Form ([AQ520](#)) by April 23, 2024, as required under [OAR 340-245-0030\(1\)\(a\)](#). For most facilities, this emissions inventory will be more detailed than the toxic air contaminant emissions inventory submitted in 2017 or 2021 because it will include information about maximum daily emissions as well as annual average emissions. If you wish to complete additional testing, this may affect submittal deadlines.

LRAPA will need to be able to verify the information submitted in your Emissions Inventory. In order for LRAPA to be able to approve your submission, please be sure to provide all supporting documents, including emissions factors and calculation methods. LRAPA will consider submissions incomplete if submitted without supporting information.

Information about CAO permitting, including the forms mentioned above and a flow chart showing the risk assessment process can be found on DEQ's CAO website at <https://www.oregon.gov/deq/aq/aqPermits/Pages/CAO-reg.aspx>.

LRAPA is available for consultation prior to reviewing and approving information submittals for the CAO permitting process, including the Emissions Inventory, Modeling Protocol, Risk Assessment Work Plan (if you plan to complete a Level 3 or Level 4 risk assessment) and the Risk Assessment itself. Once the risk assessment is complete and approved, the Risk Action Levels in [OAR 340-245-8010](#) determine whether additional action is required.

Your contact for CAO risk assessment work is:

Kelly Conlon
541-736-1056, ext. 234
kelly@lrapa.org

Please contact LRAPA to clarify any questions you may have regarding the emissions inventory and risk assessment process. We look forward to working with you.

Sincerely,



Max Hueftle, P.E., BCEE
Operations Manager
(541) 736-1056, ext. 231
Email: max@lrapa.org

Cc: Brian Brazil, International Paper, Springfield, Environmental Manager
Euripedes Valadao, International Paper, Springfield, Mill Manager
Susannah Sbragia, LRAPA Interim Director
Kelly Conlon, LRAPA Permit Writer
File



LRAPA
Lane Regional Air Protection Agency

INVOICE 664

LANE REGIONAL AIR PROTECTION AGENCY

1010 Main St
Springfield OR 97477
Phone: (541) 736-1056

Inv Date	Due Date	Permit #
01/23/2024	02/22/2024	208850

Customer No. 223
Contact: Attention: Nikita Kowal
Terms: Net 30

Bill To:

International Paper Co. - Springfield
801 42nd Street
Springfield OR 97478

Ship To:

International Paper Co. - Springfield
801 42nd Street
Springfield OR 97478

Quantity	Description	Total
1	Title V - CAO Existing Source Call-In Fee	10,000.00

Federal Tax ID #: 93-0575930

Late Fees:
8-30 days late 5%
31-60 days late 10%
61 or more days late 20%

Amount	10,000.00
Freight	
Balance Due	<u><u>10,000.00</u></u>