



# Oregon

Kate Brown, Governor

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March 1, 2022

Scott Austin  
GP Toledo  
Georgia-Pacific Toledo LLC  
1400 SE Butler Bridge Road  
Toledo, OR 97391

Mr. Austin,

This letter provides written notice to you in accordance with Oregon Administrative Rules ([OAR 340-245-0050\(1\)](#)) that GP Toledo, DEQ Air Quality Source Number 21-005, is being called in to the Cleaner Air Oregon (CAO) program, and the issuance date of this letter serves as the notice date for deadline requirements in [OAR 340-245-0030\(1\)](#).

Governor Kate Brown created the Cleaner Air Oregon 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.

Your facility must perform a risk assessment in accordance with the CAO program rules adopted by the Environmental Quality Commission. This assessment will require you to provide information about actual 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 [OAR 340-245-0050\(1\)](#).

#### Next Steps:

1. Submit the CAO Pre-Application Fee form ([AQ500](#)) with payment of the Existing Source Call-In Fee by 30 days after the notice date, or March 31, 2022 [[OAR 340-245-0400\(3\)](#)]. The CAO Existing Source Call-In fee associated with your Title V Permit is \$10,000 [[OAR 340-216-8030 Table 3](#)].
2. Submit the CAO Emissions Inventory Form ([AQ520](#)) by 90 days after the notice date, or May 31, 2022, as identified in [OAR 340-245-0030\(1\)\(a\)](#). If you wish to perform additional source testing to complete your CAO Emissions Inventory, please contact DEQ prior to submittal of this form, as this may affect submittal deadlines.

For most facilities, this Emissions Inventory will be more detailed than the recent toxic air contaminant Emissions Inventory submitted in 2021 because it will include information about maximum daily emissions as well as annual average emissions. DEQ will need to be able to verify the information submitted in your Emissions Inventory. In order for DEQ to be able to approve your submission, please provide all required supplementary materials required under [OAR 340-245-0040\(4\)\(b\)\(C\)](#). DEQ will

consider submissions incomplete if submitted without supporting information.

Information about the CAO risk assessment process and permitting, including the forms mentioned above, recommended procedures documents, and a flow chart showing the risk assessment process, can be found in the [Step-by-Step Guide for Facilities](#) available on the CAO web site, along with [Frequently Asked Questions](#).

DEQ is available for consultation prior to reviewing and approving submittals for the CAO 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, DEQ will use the Risk Action Levels identified in [OAR 340-245-8010 Table 1](#) to determine whether additional action is required under the CAO program rules.

Your contact for CAO risk assessment work is:

*Kenzie Billings, Air Toxics Project Manager*

*(503) 229-5247*

[kenzie.billings@deq.oregon.gov](mailto:kenzie.billings@deq.oregon.gov)

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

Sincerely,



Keith Johnson

Cleaner Air Oregon Program Manager

(971)246-3544

email: [Keith.johnson@deq.oregon.gov](mailto:Keith.johnson@deq.oregon.gov)

Cc: Ali Mirzakhali, DEQ  
Kenzie Billings, DEQ  
Mike Eisele, DEQ  
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