

May 27, 2022

Kenzie Billings, PE  
Oregon Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, Oregon 97232

Re: Georgia-Pacific Toledo LLC Cleaner Air Oregon Emissions Inventory Submittal

Dear Ms.. Kenzie Billings:

On March 1, 2022, the Oregon Department of Environmental Quality (DEQ) provided written notice to Georgia-Pacific (GP Toledo) that our facility located at 1400 SE Butler Bridge Road, Toledo, Oregon 97391 (the facility) was being called in to the Cleaner Air Oregon (CAO) permitting program.

Per Oregon Administrative Rule (OAR) 340-245-0030(1)(a), the first step of the CAO permitting process is to submit a toxics emissions inventory no later than 90 days after receiving the written notice from the DEQ. As requested, the CAO emissions inventory AQ520 form, containing estimates of each toxic air contaminant (TAC) emitted by the facility, is being provided electronically along with this letter. GP Toledo also prepared the following attached supporting materials to assist the DEQ during their review process:

- DEQ Forms AQ520 and AQ523
- Emission Calculation Details Workbook
- NCASI Memoranda on Wastewater Treatment System Emissions
- Process Flow Diagram

For the majority of the toxic emission units (TEUs) at the facility, TAC emissions are estimated with emission factors developed by the National Council for Air and Stream Improvement, Inc. (NCASI) for the pulp and paper industry. Emission calculations and detailed emission factor references for these TEUs are included in Form AQ520. Additional emission calculation details for the wastewater treatment system, along with supporting information from NCASI on the methodologies used, are provided as an attachment. The emission calculation details also include TAC emission estimates for the facility non-exempt stationary engines.

On March 21, 2022, the DEQ issued a guidance document titled “Cleaner Air Oregon Exempt TEU Reporting” (the guidance document), which outlines the procedures to be used to determine if activities previously categorically insignificant may be considered exempt TEUs. This letter addresses the categorically insignificant activities no longer considered categorically exempt under CAO that could potentially apply to the facility.

**Maintenance and repair shops & automotive repair shops or storage garages.** GP Toledo did not identify any products used in the facility maintenance shops that contain TACs

in excess of the reporting thresholds in the guidance document. The facility uses one type of welding electrode in amounts that exceed the applicable threshold.

Table 8 of the enclosed Emission Calculation Details workbook provides TAC emission estimates for the welding electrode that exceeded the reporting threshold. Table 9 presents a Level 1 risk assessment (L1RA) for the TACs that exceed the threshold using the same conservative assumption listed in Appendix C of the guidance document. The results of the L1RA were well below the target risks of 0.25 excess cancer risk and 0.05 chronic noncancer hazard index listed in the guidance document. Level 1 risk screens do not represent actual risk, and in most cases actual risk will be tens or hundreds of times lower than what is estimated by a Level 1 screening. The results from the L1RA show that TAC emissions from the maintenance shops do not materially contribute to potential health risks to the community, and the maintenance shop should be considered an exempt TEU.

**Routine maintenance, repair, and replacement such as anticipated activities most often associated with and performed during regularly scheduled equipment outages to maintain a plant and its equipment in good operating condition, including but not limited to steam cleaning, abrasive use, and woodworking.** GP Toledo did not identify any products used for routine maintenance and repairs activities that contain TACs.

**Storage tanks, reservoirs, transfer and lubricating equipment used for ASTM grade distillate or residual fuels, lubricants, and hydraulic fluids & on-site storage tanks not subject to any New Source Performance Standards (NSPS), including underground storage tanks (UST), storing gasoline or diesel used exclusively for fuel of the facility's fleet vehicles.** All diesel, lubricants, and oils at the facility are stored at ambient temperature and are exempt from reporting requirements per the guidance document. The facility does not have an on-site gasoline storage tank. All gasoline for the facility's fleet vehicles is purchased at off-site retail stations.

**Natural gas, propane, and liquified petroleum gas storage tanks and transfer equipment.** Natural gas used at the facility is connected via hard-pipe to the on-site boilers and recovery furnaces. Propane is used to fuel forklifts and usage is not considered "extensive use" of this fuel. Therefore, we believe that these activities should be considered exempt TEUs.

**Diesel combustion emergency generators.** GP Toledo operates five emergency diesel engines. Emission estimates for the diesel engines are included in form AQ520 and the attached emission calculation details workbook. Note the facility also operates six non-emergency, gasoline engines. All of the gasoline engines except for EU141 are categorically insignificant under OAR 340-200-0020(23)(c), therefore, only emission estimates for EU141 are included in form AQ520.

**Industrial cooling towers that do not use chromium-based water treatment chemicals.** The water treatment chemicals used in the facility's industrial cooling towers contain trace amounts of phosphoric acid and sulfuric acid. GP Toledo does not expect any TAC emissions to be released from the treatment chemicals because the acids dissociate when added to the cooling tower water and are fully consumed in the treatment process. Therefore, we believe that these activities should be considered exempt TEUs.

**Broke beaters, pulp and repulping tanks, stock chests and pulp handling equipment & stock cleaning and pressurized pulp washing & white water storage tanks.** GP Toledo has included emission estimates for the applicable TEUs in this category in form AQ520 and will include the applicable TEUs in the risk assessment.

We look forward to working with the DEQ throughout the CAO permitting process. Please contact Scott Austin at (541) 336-8318 if you have any comments or require clarifying information.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Tucker". The signature is fluid and cursive, with a large initial "R" and "T".

Richard Tucker  
Vice President of Manufacturing

cc: J.R. Giska, DEQ  
Mike Eisele, DEQ  
Matt Davis, DEQ