



Oregon

Tina Kotek, Governor

Department of Environmental Quality
Agency Headquarters
700 NE Multnomah Street, Suite 600
Portland, OR 97232
(503) 229-5696
FAX (503) 229-6124
TTY 711

December 28, 2023

Quinn Burke-Anderson
Stimson Lumber Company
49800 SW Scoggins Valley Rd
Gaston, OR 97119-9132
Sent via email only

Quinn Burke-Anderson,

DEQ received notice (assigned application no. 035156) on December 1, 2023 from Stimson Lumber Company (Stimson) of Stimson's plans to install an emergency backup generator at its Forest Grove facility in Gaston, Oregon. This source was "called-in" to DEQ's Cleaner Air Oregon (CAO) Program on July 2, 2020, and notified in writing by DEQ of the requirement to submit a risk assessment. Because DEQ has not yet issued this source a Toxic Air Contaminant Permit Addendum, or an operating permit in compliance with CAO rules, Stimson is required to revise and update any materials submitted to date under CAO's Risk Assessment Procedures ([OAR 340-245-0050](#)) to include the new emergency generator as a Toxics Emissions Unit (TEU). [[OAR 340-245-0060\(4\)\(b\)\(B\)](#)]

To date Stimson has submitted, and DEQ has approved, the Emissions Inventory, Modeling Protocol, and Risk Assessment Work Plan required as part of the CAO process. Please revise these documents to include the planned emergency generator (TEU EGEN01), and re-submit them concurrently with the Risk Assessment, which is currently due **by no later than March 6, 2024**. In addition, DEQ has reviewed the emissions information in the AQ104B form submitted by Stimson on December 1, 2023, for this generator and requests that the following updates be made in the revisions:

1. Please add the following Toxic Air Contaminants (TACs) to the emissions for TEU EGEN01, for consistency with DEQ's recently-updated list of default emission factors for diesel internal combustion engines (see Attachment A):
 - a. Propylene (CASRN 115-07-1): 0.47 pounds per thousand gallons; and
 - b. Chlorobenzene (CASRN 108-90-7): 0.0002 pounds per thousand gallons; and
2. For consistency, please apply the emission factors from DEQ's "Combustion Emission Factor Search Tool" (see Attachment A) to all diesel internal combustion engines in the Inventory (TEUs BGEN, FIRE, and EGEN01).

If you have any questions, please contact me directly at (503) 866-9643 or julia.degagne@deq.oregon.gov, and I look forward to your continued assistance with this process.

Sincerely,

Julia DeGagné
Cleaner Air Oregon Program Engineer

34-2066 Stimson Lumber Company

Enc: Attachment A: Combustion Emission Factor Search Tool

Cc: Brian Bartlett, Stimson Lumber Company
Andrew Rogers, Maul Foster and Alongi
Patty Jacobs, DEQ
J.R. Giska, DEQ
File