



Georgia-Pacific Toledo LLC
1400 SE Butler Bridge Road
Toledo, Oregon 97391

April 19, 2024

Ms. Heather Kuoppamaki
Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR 97232
(Sent via email only)

Re: Clean Air Oregon (CAO) Emission Inventory Information Request Extension

Dear Ms. Kuoppamaki,

By letter dated February 6, 2024, following an initial review, the Oregon Department of Environmental Quality (DEQ) provided written notice to Georgia-Pacific (GP Toledo) requesting additional information pertaining to the CAO Emission Inventory submitted on May 27, 2022. The information request required the additional information be submitted by May 6, 2024. GP respectfully submits this extension request as allowed by OAR 340-245-0030(3).

(3) An owner or operator may request an extension of time from a deadline established in section (1) or section (2) by providing DEQ with a written request no fewer than 15 days prior to the submittal deadline. DEQ may grant an extension based on the following criteria:

(a) The owner or operator has demonstrated progress in completing the submittal; and

(b) A delay is necessary, for good cause shown by the owner or operator, related to obtaining more accurate or new data, performing additional analyses, or addressing changes in operations or other key parameters, any of which are likely to have a substantive impact on the outcomes of the submittal.

GP Toledo has made substantial efforts to collect and compile the requested information but due to the extent of information still needing to be gathered, GP Toledo is requesting a 90-day extension of the due date.

This additional time is needed in order to collect and analyze samples from the kraft and white-water systems which have not returned to stable operations due to an extended facility maintenance outage; compile safety data sheets for all chemicals, welding rods and various consumables used on site; delve into the data used by NCASI in order to develop the H₂S emissions estimates model; and other similar, relevant items. Additionally, GP Toledo is working on a concurrent information request from DEQ to update and model the facility's short-term NAAQS emission inventory which requires significant time and effort from the environmental staff.

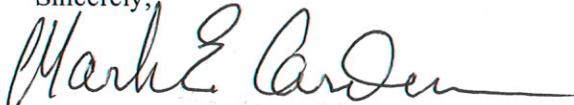
As requested during the meeting between ODEQ and the Toledo Mill on April 10, 2024, a list of items that GP plans to submit by the deadline date is included below. For brevity, only the item number from the information request is listed.

- 1.d
- 2.a.ii,iiii, and v

- 2.c
- 2.e
- 7.a and b
- 9.d
- 10.a, b, and c
- 10.d ii, iii,
- 10.e
- 10.f
- 10.k
- 10.l.ii
- 11.a
- 11.b
- 12
- 13.a, b
- 14.a, b, and d
- 16.a, b, and e
- 17
- 18.a.i
- 18.b.i
- 18.c
- 18.d
- 19.a, b, and d
- 20
- 21.a, b

We look forward to continued collaboration with DEQ throughout the CAO process. Please contact Scott Austin at (541) 336-8318 or Scott.Austin2@gapac.com if you have any questions regarding this extension request.

Sincerely,



Mark E. Carden
Vice President– Georgia-Pacific Toledo LLC

CC: Michael Eisele, DEQ (via email)
Julia DeGagne, DEQ (via email)
Zach Loboy, DEQ (via email)
J.R. Giska, DEQ (via email)