



Oregon

Tina Kotek, Governor

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April 24, 2024

Georgia-Pacific Toledo LLC
1400 SE Butler Bridge Road
Toledo, OR 97391
Sent via email only

Scott Austin,

DEQ received the submittal of the Cleaner Air Oregon (CAO) Emissions Inventory (Inventory) for Georgia-Pacific Toledo LLC (GP Toledo) in Toledo, OR on May 27, 2022. DEQ completed an initial review and provided comments in a letter dated February 6, 2024. In the email transmitting the initial review, DEQ requested a meeting to discuss the hydrogen sulfide (CASRN 7783-06-4) emissions estimates from the wastewater treatment plant. DEQ and Georgia Pacific representatives met online on February 29, 2024, to discuss the methodology used to estimate hydrogen sulfide emissions.

DEQ has the following comments on the methodology used:

- In the National Council for Air and Stream Improvement (NCASI) Technical Bulletin (TB) 956, concentration measurements downwind and along the perimeter of a given wastewater treatment basin were used to develop an emissions profile. However, the ground level monitoring conducted at the GP Toledo facility does not appear to capture the full downwind component of the emissions profile. DEQ is concerned that with only three monitors on the perimeter of the wastewater treatment plant (WWTP), the ground level measurements are not representative of worst-case emissions from the WWTP.
- NCASI TB 956 examined more simplified pond configurations and the measurements and emission factors produced were specific to individual emission units. The GP Toledo WWTP has numerous emission unit types with varying temperatures, pH levels, and aeration rates. DEQ is concerned that the methodology documented in NCASI TB 956 does not appropriately capture the varying emissions from the different types of emissions units of the GP Toledo facility.

Overall, the methods used in the GP Toledo hydrogen sulfide emissions estimates appear to vary significantly from the NCASI established methods without supporting documentation to justify those variations. DEQ is therefore requesting additional information to determine if a different hydrogen sulfide emissions model, such as H2SSIM or WATER9, may be more appropriate for these emissions units.

Based on the NCASI memorandum dated May 23, 2022, the February 29, 2024, meeting, and the comments above, and in accordance with [Oregon Administrative Rule \(OAR\) 340-245-0030\(2\)](#), DEQ has determined that the following additional information is required **by August 5, 2024**¹:

1. Required data inputs, limitations, available outputs, and background methodology for NCASI's H2SSIM program;
2. All liquid parameter measurements taken from any of the emission units or influent streams, from

¹ This due date aligns with the extended due date to submit an updated Emissions Inventory recently requested by GP Toledo and approved by DEQ.

April 2021 until the present. The data should indicate the sampling location, date, and time, and should include but not be limited to:

- a. Temperature
 - b. pH
 - c. Flow rates of influent streams
 - d. Dissolved oxygen
 - e. Oxygen reduction potential;
3. Indicate if there are additional heat inputs to the thermal ponds; and if so, provide information on those heat sources; and
 4. Provide details on the liquid sample collection methods used and if those methods were in accordance with NCASI TB 956 and 957.

DEQ is requesting that you submit additional information to complete your Inventory. If you think that any of that information is confidential, trade secret or otherwise exempt from disclosure, in whole or in part, you must comply with the requirements in [OAR 340-214-0130](#) to identify this information. This includes clearly marking each page of the writing with a request for exemption from disclosure and stating the specific statutory provision under which you claim exemption. Emissions data is not exempt from disclosure.

DEQ remains available to discuss this information request with you and answer any questions you may have. Failure to provide additional information, corrections, or updates to DEQ by the deadlines above may result in a violation of [OAR 340-245-0030\(1\)](#).

If you have any questions regarding this letter, please contact me directly (503-407-7596, heather.kuoppamaki@deq.oregon.gov), and I look forward to your continued assistance with this process.

Sincerely,



Heather Kuoppamaki, P.E.
Cleaner Air Oregon Project Manager

Cc: Logan Vaughan, Georgia-Pacific
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