



# BIOMASS ONE LP

2350 Avenue G  
White City, Oregon 97503  
Office: 541-826-9422  
Fax: 541-826-6186  
www.biomassone.com

Amy DeVita-McBride  
Cleaner Air Oregon Project Engineer  
Oregon Department of Environmental Quality  
700 NE Multnomah St. Ste 600  
Portland, OR 97232

Biomass One, L.P. is requesting an extension to the deadline for submittal of the Emissions Inventory, from the current date of July 25, 2024, until September 20, 2024, to allow adequate time to conduct a second source test to confirm results from previous source tests regarding our emission factor for arsenic on the Boilers (TEU-011 and TEU-012).

Test results from 2023 source testing indicated that the emission factor for arsenic for the South Boiler was nearly three times higher than the emission factor for arsenic for the North Boiler. Since the boilers are essentially identical, and use a common fuel supply system, this difference appears to be an anomaly.

While comparing the totality of the results for source testing shows that on average, the differences between all emission factors for the two boilers were low, and relatively even with regard to being positive and negative, there are a few sets of anomalous readings showing unexplained differences of this magnitude. The anomalous difference in the arsenic readings, however, was the only anomalous reading that impacted a risk action level, i.e. triggering Community Engagement.

Biomass One, L.P. has explored three different hypotheses to explain this difference and while all are at least somewhat plausible, none are definitive based on available evidence.

For this reason, an extension is requested to run an additional set of source tests for arsenic, in order to confirm, or refute, the anomalous reading. Given the need to schedule the source testing, provide a source testing plan to DEQ at 30 least days prior to testing, and then wait approximately 60 days for results, Biomass One, L.P. is requesting that September 20<sup>th</sup> of this year be our new deadline for submittal of our emissions inventory.

Respectfully Submitted,  
  
Kurt E. Lumpkin | General Manager

Biomass One, LP  
2350 Avenue G  
White City, OR 97503  
O:541.826.9422  
M:541.944.6797

Cc: Lauraleigh Lakocy, DEQ, via email (Lauraleigh.Lakocy@deq.oregon.gov)  
Katie Eagleson, DEQ via email (Katie.Eagleson@deq.oregon.gov)