

From: [DEGAGNE Julia * DEQ](#)
To: [Andrew Rogers](#); [Quinn Burke-Anderson](#)
Cc: [JACOBS Patty * DEQ](#); [Brian Bartlett](#); [RUDLOFF Owen * DEQ](#); [GISKA JR * DEQ](#)
Subject: RE: CAO Risk Assessment Report - Stimson Lumber Company
Date: Tuesday, June 18, 2024 12:41:00 PM
Attachments: [image001.png](#)
[Attachment A_AO520Form\(2024\)_DEQ.xlsx](#)

Hello Andrew and Quinn (and welcome back Andrew!),

CAO has completed our review of Stimson's Risk Assessment and I hope to send a formal approval soon. To that end, could you respond to the few loose ends below **by Wednesday June 26**? If you need more time, please let me know in the next 2-3 days.

1. I'm attaching a revised AQ520 with a few updates highlighted in yellow – can you review the below and let me know if you agree with the changes?
 - a. Worksheet 3 had what looked like a cut-and-paste error for some TACs from the BGEN TEU, so I corrected these (The correct emissions were used in the risk assessment, so no updates needed there).
 - b. On Worksheet 2, the unit description has been updated for TEUs TANK_DSL1 and TANK DSL2 to indicate that these are exempt TEUs under [OAR 340-0060\(3\)\(a\)](#).

2. As Owen and Andrew have been discussing, we noted that the exposure location for maximum child risk indicated in Table 6-1 of the Risk Assessment report is not the worst-case child exposure location. We agree that designating all discrete child receptors is not typically necessary at distances greater than about 2 km, but it is important for transparency to the public that the correct worst-case child exposure location and risk are identified. In this case, Owen calculated the risk at the closer-in schools and determined the worst-case exposure location is at Gaston Union Jr./Sr. High School and the child cancer risk there is 0.016 per million. Because risk around this school was assessed as a worker exposure location and in this case that is conservative overall, no updates are needed to the risk assessment. However, we plan to note the worst-case location and the child risk of 0.016 in our approval letter as an update to Table 6-1. Please let us know if you agree with that risk number and location.

3. We noted a few errors in the Risk Assessment report, but since they are minor and don't impact risk we will not require a revision of the report. You are welcome to revise and resubmit if you wish but otherwise we can just note these in the approval letter:
 - a. The final revision dates listed in Table 1-1 are not accurate.
 - b. Footnote b to Table 6-1 lists an incorrect equation. The equation used for excess cancer risk is "annual concentration divided by RBC" instead of "RBC divided by concentration".
 - c. The map legend for Figure 4-2 should read "UTM 200 Meter Grid Mark" instead of "UTM 500 Meter Grid Mark."

Thank you for your attention to this and helping to wrap it up.

Sincerely,



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