



Oregon

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acpi Wood Products, LLC
625 Hoffman Rd.
Independence, OR 97351
Sent via email only

John Hamlin,

DEQ received the submittal of the Cleaner Air Oregon (CAO) Emission Inventory (Inventory) for the acpi Wood Products, LLC (acpi) in Independence, OR on November 26, 2024, and has completed an initial review.

In accordance with [Oregon Administrative Rule \(OAR\) 340-245-0030\(2\)](#), DEQ has determined that the following additional information, corrections, and updates are required by April 22, 2025, in order to approve the Inventory:

General Comments

Actual Emissions: Per [OAR 340-245-0040\(4\)\(a\)\(B\)\(i\)\(I\)](#), existing sources are required to submit actual annual and maximum daily production activities and usage for the calendar year preceding the DEQ call in. For acpi, the calendar year of interest is 2023. From supporting information received with the Inventory, DEQ understands that the actual basis presented in the Inventory is the 12-month period between September 1, 2023, and August 31, 2024; acpi has indicated that this period was selected as it aligns with a significant change in coating products and is therefore more representative of current actual operations than the calendar year 2023 data. In this case, DEQ will accept this alternate period as the basis of the actual production activities and usages.

Coating Composition: From supporting information submitted to DEQ, it is assumed that acpi has used environmental data sheets (EDSs) as the basis for coating product compositions used in the Inventory. DEQ has reviewed safety data sheets (SDSs) for some of the coating products used at acpi and has noted that some toxic air contaminants (TACs) may be present in coating products, but not identified on a product's EDS. Examples of TACs found in product SDS but not EDS: crystalline silica (CASRN 7631-86-9), xylene (CASRN 1330-20-7), 1,2,4-trimethylbenzene (CASRN 95-63-6), and metal TAC containing compounds. Therefore, DEQ requires that acpi obtain and review SDSs for all coating products materials to identify all TACs and update the Inventory as appropriate. DEQ has provided specific requests below.

Specific Comments

1. Safety Data Sheets:

- a. Provide SDSs for all coating materials used at your facility.
- b. Provide a "cross-walk" for coating materials which matches acpi's naming used in the Inventory with the product names and/or codes presented in the "Independence Product Calculations.xlsx" workbook and the supplier's naming and/or product codes used in the SDSs and EDSs.

2. **Revised Inventory:** Submit to DEQ a revised Inventory (AQ520), along with all supporting calculations in Excel format, as well as all information required under [OAR 340-245-0040\(4\)](#). Include the following updates to the AQ520:
- a. Revised Coating Composition:
 - i. Incorporate emissions for additional TACs identified in review of coating SDSs (see General Comments). Note that emission estimates for the actual activity basis are not required per [OAR 340-245-0040\(4\)\(b\)\(B\)](#) unless the source elects to be permitted based on actual emissions.
 - ii. Provide a list of coatings for which TACs have been added to the Inventory after review of the SDSs. This could be incorporated as an additional column in the Coating tabs of the “Independence Product Calculations.xlsx” workbook.
 - b. Review of Hazardous Air Pollutants (HAPs) emission estimates prepared for acpi’s Title-V permit renewal application show the coating operations (EU-01) has the potential to emit several TACs which were not included in the Inventory. Review and revise coating emissions as appropriate to resolve discrepancies for the following chemicals:
 - i. Methanol (CASRN 67-56-1);
 - ii. Glycol ethers (multiple CASRNs);
 - iii. Hydroquinone (CASRN 123-31-9);
 - iv. Diethanolamine (CASRN 111-42-2); and
 - v. Triethanolamine (CASRN 121-44-8).
 - c. TEU-17 and TEU-18:
 - i. Update TEU names for TEU-17 and TEU-18 in Column A of Worksheet 2 to distinguish between the four wood products. Ensure naming of TEUs in Column A of Worksheet 2 matches those in Column A of Worksheet 3.
 - ii. Update TEU description in Column B of Worksheet 2 to include a description of the activity associated with each TEU. For example: “[Line Name] Woodworking Operations (cutting, sanding, milling), [Wood Product].”
 - iii. Update the References/Notes in Column I of Worksheet 3 to indicate activities represented by the emission factor. As an example, for MDF: the formaldehyde (CASRN 50-00-0) emission factor is for sanding operations and the methanol (CASRN 67-56-1) emission factor is for sanding and sawing.
 - d. Natural Gas Space Heaters (TEU-NGC):
 - i. Information presented in the facility’s permit review report indicates that acpi operates fourteen (14) natural gas-fired space heaters (totaling 1.1 MMBtu/hr) and six (6) process heaters (totaling 5.58 MMBtu/hr). Information provided with the Inventory indicate the facility only has 11 space heaters with a heat input capacity of 0.125 MMBtu/hr each (1.38 MMBtu/hr total). Please clarify this discrepancy and update the Inventory as appropriate.
 - ii. Confirm if the natural gas usage presented in Workbook 2 represents the capacity of the natural gas-fired units. If not capacity of these units, include the natural gas usage as “Requested PTE” or refine the capacity natural gas usage for this TEU.
 - iii. Confirm the emission points for the natural gas heaters presented in Column E of Worksheet 2. Currently, natural gas combustion emissions are identified as being evenly distributed through the coating line and baghouse stacks.

- iv. Include emissions estimates for benzo[a]pyrene (CASRN 50-32-8) in Worksheet 3. The emission factor for benzo[a]pyrene is 0.0000012 lb/MMSCF (AP-42 Chapter 1.4, Table 1.4-3).¹
 - e. **TEU-1 through TEU-16:** Provide additional documentation describing how product usage rates in Worksheet 4 and emission estimates in Worksheet 5 were developed for the Requested PTE/Capacity basis. This documentation must provide justification that this approach represents a worst-case approach to estimating TAC emissions from the coating operations.
3. **Glue:** The process flow diagram indicates that glues are used in the Cabinet Assembly process. Please review SDS for all glue products used in production and update the Inventory as needed to account for TAC emissions from production glue use. Provide copies of SDSs for all glues and adhesives used in production for DEQ's review.
 4. **Stains:** Provide an explanation of the difference between "Spray Stains" and "Wipe Stains" the supporting workbook "Independence Product Calculations.xlsx" specifies production levels for these two types of stains. Explain if emissions from these two types of stains are quantified differently.
 5. **Transfer Efficiency:** Provide documentation to support a spray booth transfer efficiency of 75 percent.
 6. **Filter Specifications:** Provide documentation (such as vendor specification sheets) to support a spray booth filter removal efficiency of 99.2 percent for particulate matter (PM).
 7. **Spray Line Operation:** Confirm the total number of spray lines at acpi. The facility's permit notes a total of four spray lines with five spray booths each, but the Inventory only accounts for 3 spray lines.
 8. **Process Flow Diagram:** Update the process flow diagram to incorporate the following requested changes.
 - a. Identify TEU-17 and TEU-18 on the diagram.
 - b. Update Stack IDs for the North and South Dust Collectors to match the Stack IDs in the Inventory.
 - c. Ensure formatting of TEU and Stack IDs match those used in the Inventory. For example, if the Inventory uses a dash ("-") in the TEU ID which is not included in the naming used in the process flow diagram.
 - d. Update TEU-NGC emission points as appropriate per Specific Comment 2.d.iii.

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

¹ EPA. September 1998. AP-42 Chapter 1, Table 1.4-3 "Emission Factors for Speciated Organic Compounds from Natural Gas Combustion." https://www.epa.gov/sites/production/files/2020-09/documents/1.4_natural_gas_combustion.pdf

may result in a violation of [OAR 340-245-0030\(1\)](#).

If you have any questions regarding this letter please contact me directly at (971) 300-3653 or amy.devita-mcbride@deq.oregon.gov. I look forward to your continued assistance with this process.

Sincerely,



Amy DeVita-McBride
Cleaner Air Oregon Project Engineer

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Gregory Raetz, HDR Inc.
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