



# Oregon

Tina Kotek, Governor

Department of Environmental Quality  
Agency Headquarters  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232  
(503) 229-5696  
FAX (503) 229-6124  
TTY 711

February 28, 2025

Freres Lumber Co. Inc.  
141 14<sup>th</sup> St.  
Lyons, OR 97358  
*Sent electronically only*

Mike Flewelling,

This letter provides written notice to you in accordance with Oregon Administrative Rules ([OAR 340-245-0050\(1\)](#)) that Freres Lumber Co. Inc., DEQ Air Quality Source Number 22-6002, is being called in to the Cleaner Air Oregon (CAO) program. The issuance date of this letter serves as the notice date for deadline requirements in [OAR 340-245-0030\(1\)](#).

Your facility must perform a Risk Assessment in accordance with the CAO program rules adopted by the Environmental Quality Commission. This assessment will require you to provide emissions information (for example, production activities, emissions units, and control devices) that will be used, in conjunction with other data about where your facility is located, to estimate risks to the surrounding community as required under [OAR 340-245-0050\(1\)](#). All submittals for the CAO Risk Assessment process must be completed through [Your DEQ Online](#).

#### Next Steps:

1. Submit the CAO Existing Source Risk Assessment Application with payment of the Existing Source Call-In Fee by **30 days** after the issuance date of this letter, or **March 31, 2025**. [[OAR 340-245-0400\(3\)](#)] The CAO Existing Source Call-In fee associated with your Title V Operating Permit is **\$10,300**. [[OAR 340-216-8030 Table 3](#)] Note that an additional 4 percent technology fee of **\$412** will be applied to this payment in YDO.
2. Submit the CAO Emissions Inventory Form ([AQ520](#)) by **90 days** after the issuance date of this letter, or **May 29, 2025** as identified in [OAR 340-245-0030\(1\)\(a\)](#). If you wish to perform additional source testing to complete your CAO Emissions Inventory, please contact DEQ prior to this submittal deadline, as this may affect the dates listed above.

For most facilities, this Emissions Inventory will be more detailed than previously submitted emissions information because it will include information about maximum daily emissions as well as annual average emissions. In order for DEQ to be able to approve your submission, please provide all required supplementary materials required under [OAR 340-245-0040\(4\)](#). DEQ will consider submissions incomplete if submitted without the required supporting information.

Information about the CAO Risk Assessment process and permitting, including the forms mentioned above, recommended procedures documents, and a flow chart showing the Risk Assessment process, can be found in the [Step-by-Step Guide for Facilities](#) available on the CAO web site, along with [Frequently Asked Questions](#).

DEQ is available for consultation prior to reviewing and approving submittals for the CAO process, including the Emissions Inventory, Modeling Protocol, Risk Assessment Work Plan (if you plan to complete a Level 3 or Level 4 Risk Assessment) and the Risk Assessment itself. Once the Risk

22-6002 Freres Lumber Co. Inc.

Assessment is complete and approved, DEQ will use the Risk Action Levels identified in [OAR 340-245-8010 Table 1](#) to determine whether additional action is required under the CAO program rules.

Your contact for CAO Risk Assessment work is:

Heather Kuoppamaki – CAO Project Engineer  
[Heather.Kuoppamaki@deq.oregon.gov](mailto:Heather.Kuoppamaki@deq.oregon.gov)  
503.407.7596

Please contact DEQ to clarify any questions you may have regarding the Emissions Inventory and Risk Assessment process. We look forward to working with you.

Sincerely,



J.R. Giska  
Cleaner Air Oregon Program Manager  
[JR.giska@deq.oregon.gov](mailto:JR.giska@deq.oregon.gov)  
971.337.4102

Cc: Heather Kuoppamaki, DEQ  
Katie Eagleson, DEQ  
Alex Haulman, DEQ  
Zach Loboy, DEQ  
Ali Mirzakhali, DEQ  
File