

# Modeling Protocol and Risk Assessment Report

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Stimson Lumber Company—Gaston, Oregon

*Prepared for:*

**Oregon Department of Environmental Quality**

Air Quality Permitting Programs

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Project No. M0066.03.11

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# Modeling Protocol and Risk Assessment Report

## Stimson Lumber Company—Gaston, Oregon

*The material and data in this report were prepared under the supervision and direction of the undersigned.*

*Maul Foster & Alongi, Inc.*



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# Abbreviations and Acronyms

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AAQS	Ambient Air Quality Standards
ACDP	Air Contaminant Discharge Permit
approved risk assessment	risk assessment report approved by the DEQ on August 5, 2024.
ASOS	Automated Surface Observation Systems
BPIP	Building Profile Input Program
CAO	Cleaner Air Oregon
DEQ	Department of Environmental Quality (Oregon)
existing permit	Title V Operating Permit No. 34-2066-TV-01 issued by the DEQ on June 1, 2023
EPA	U.S. Environmental Protection Agency
ESP	dry electrostatic precipitator
GHG	greenhouse gas
g/s	gram per second
HAP	hazardous air pollutant
Hillsboro met station	Portland-Hillsboro Airport station
Mbdft	thousand board feet
HAP	hazardous air pollutant
MFA	Maul Foster & Alongi, Inc.
NO <sub>x</sub>	total nitrogen oxides
OAR	Oregon Administrative Rule
PM	particulate matter
PM <sub>10</sub>	particulate matter less than or equal to 10 microns in aerodynamic diameter
PM <sub>2.5</sub>	particulate matter less than or equal to 2.5 microns in aerodynamic diameter
proposed project	Proposed new sawmill and permitted production increases for existing emission units
RAL	risk action level
RAWP	Risk Assessment Work Plan
RBC	risk-based concentration
the facility	lumber and hardboard facility located at 49800 SW Scoggins Valley Road in Gaston, Oregon 97119
SET	significant emission threshold
SO <sub>2</sub>	sulfur dioxide
Stimson	Stimson Lumber Company

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TAC	toxic air contaminant
TEU	toxic emissions unit
ug/m <sup>3</sup>	microgram per cubic meter
updated	complete 5-year period of January 1, 2020 through December 31, 2024
meteorological dataset	
VOC	volatile organic compounds
WWTP	wastewater treatment plant

# 1 Modeling Summary

Stimson Lumber Company (Stimson) owns and operates a lumber and hardboard facility located at 49800 SW Scoggins Valley Road in Gaston, Oregon 97119 (the facility). Stimson is proposing to expand operations at the facility with the construction of a new sawmill. Summaries of the results of the required modeling for the proposed project are shown below, and more details are provided in subsequent sections. Summaries of the ambient air quality standard (AAQS) analysis results and the updated Level 3 Risk Assessment results are shown in Table 1-1 and Table 1-2, respectively. As shown in Table 1-1, emissions from the proposed project will not cause or contribute to a new exceedance of the short-term AAQS for particulate matter with an aerodynamic diameter of less than or equal to 2.5 microns (PM<sub>2.5</sub>), the only pollutant subject to short-term AAQS modeling.

**Table 1-1: AAQS Results Summary**

Cumulative Impact Analysis—AAQS Assessment <sup>(1)</sup>							
Pollutant	Averaging Period	Modeled Impact (ug/m <sup>3</sup> )	Secondary Impact (ug/m <sup>3</sup> )	Background Conc. (ug/m <sup>3</sup> )	Design Value (ug/m <sup>3</sup> )	AAQS (ug/m <sup>3</sup> )	Design Value Exceeds AAQS?
PM <sub>2.5</sub>	24-Hour	4.47	0.052	16.0	20.5	35	No

**Notes**

PM<sub>2.5</sub> = particulate matter less than 2.5 micrometers in aerodynamic diameter; ug/m<sup>3</sup> = micrograms per cubic meter; AAQS = Ambient Air Quality Standard.

<sup>(1)</sup> See Table 8-1 for additional data references and details.

As shown in Table 1-2, the proposed project will not elevate facility-wide cancer and noncancer risk above an existing risk action level (RAL) that was identified in the Risk Assessment Report approved by the Oregon Department of Environmental Quality (DEQ) on August 5, 2024 (approved risk assessment) for the Cleaner Air Oregon (CAO) permitting program.

**Table 1-2: Level 3 Risk Assessment Results Summary <sup>(2)</sup>**

Exposure Assessment	CAO Program Risk/Hazard Index	Updated Facility Risk/Hazard Index	Risk Action Level Analysis
<b>Cancer Risk (chances-in-a-million)</b>			
Residential	16	24	Below Community Engagement Level
Non-Residential Child	<0.1	<0.1	Below Source Permit Level
Worker	0.3	2	Below Source Permit Level
<b>Chronic Noncancer Hazard Index</b>			
Residential	0.5	1	Below Community Engagement Level
Non-Residential Child	<0.1	<0.1	Below Source Permit Level
Worker	<0.1	0.2	Below Source Permit Level
Acute Noncancer Hazard Index	1	1	Below Community Engagement Level

**Notes**

<sup>(2)</sup> See Table 8-3 for additional data references and details.

## 2 Introduction

Stimson Lumber Company (Stimson) owns and operates a lumber and hardboard facility located at 49800 SW Scoggins Valley Road in Gaston, Oregon 97119 (the facility). The facility currently operates under Title V Operating Permit No. 34-2066-TV-01 issued by the DEQ on June 1, 2023.

Stimson is proposing to expand operations at the facility with the construction of a new sawmill. The new sawmill will allow for an increase in lumber production from 180,000 thousand board feet (Mbdft) per year to 280,000 Mbdft per year. The new sawmill will include several new sources that have the potential to emit particulate matter (PM), PM with an aerodynamic diameter of less than or equal to 10 microns (PM<sub>10</sub>), and PM<sub>2.5</sub>. To accommodate the new sawmill, several existing sources at the facility will require an increase in permitted annual throughputs by way of increasing annual operating hours. Collectively, the proposed sawmill and changes are referred to as the “proposed project.” A detailed description of the proposed project, including new and modified emission units, is provided in Sections 3 and 4, below, and the Construction Air Contaminant Discharge Permit (ACDP) application being submitted concurrently with this modeling protocol. As discussed in the Construction ACDP application, the proposed project will be considered a Type 3 change per Oregon Administrative Rule (OAR) 340-210-0225(3).

As identified in the Construction ACDP application, the proposed project will not require an increase in Plant Site Emissions Limits greater than or equal to a Significant Emission Rate above the netting basis for any pollutant. As a result, the proposed project will not trigger New Source Review permitting and subsequently, Class II New Source Review modeling will not be required.

As shown in Table 2-1, the proposed project will result in an increase of daily PM<sub>2.5</sub> emissions above the short-term emissions threshold. As a result, a 24-hour dispersion modeling assessment for PM<sub>2.5</sub> will be required to demonstrate short-term emissions from the facility will not exceed the AAQS.

**Table 2-1. Proposed Project Short-Term Potential to Emit**

Parameter	PM <sub>2.5</sub> 24-Hour Assessment (lb/day)	SO <sub>2</sub> 1-Hour Assessment (lb/hr)	NO <sub>x</sub> 1-Hour Assessment (lb/hr)
Proposed PTE	28.1	--	--
Short-Term SET <sup>(1)</sup>	5	3	3
Proposed PTE Exceeds Short-Term Set?	<b>YES</b>	no	no

**Notes**  
 -- = No changes proposed to short-term emissions.  
 (1) DEQ. Recommend Procedures for Air Quality Dispersion Modeling. March 2022.

Stimson retained Maul Foster & Alongi, Inc. (MFA) to prepare the Construction ACDP application and this combined modeling protocol and risk assessment report for the proposed project. The proposed methodology for demonstrating compliance with the short-term AAQS for the affected pollutant is presented in Section 4. As identified in Section 8, the results of a cumulative impact analysis demonstrate that PM<sub>2.5</sub> emissions from the facility will not cause or contribute to a new exceedance of the short-term AAQS.

MFA proposes to submit a combined application package that includes the PM<sub>2.5</sub> short-term AAQS modeling protocol and report, a CAO modeling protocol, Risk Assessment Work Plan (RAWP), and risk assessment report, and the Construction ACDP application.

The remainder of this combined modeling protocol and risk assessment report outlines the modeling methodologies proposed to assess the PM<sub>2.5</sub> short-term AAQS compliance demonstration for the proposed project and perform an updated level 3 risk assessment to demonstrate that facility-wide risk, including the proposed project, will not exceed any risk action levels (RALs) established during the CAO program. This document includes the results of each assessment when performed according to the proposed methodologies.

## 3 Facility Description

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### 3.1 Facility Location

The facility is located in Gaston, Oregon, west of Oregon Highway 47 in Washington County. The City of Gaston is located in the Tualatin Valley between the foothills of the Chehalem Mountains and the Coast Range. The area immediately surrounding the facility is the Scoggins Valley, a northwest-southeast-trending valley, with nearby elevations of approximately 1,200 feet above mean sea-level. Henry Hagg Lake is located northwest of the western property boundary. Stimson owns approximately 716 acres in the Scoggins Valley, including the 63-acre plot on which the facility sits. The facility is surrounded by a mixture of residential, private forest, and agricultural land-use zones. An aerial image of the facility location and the modeling boundary is shown in Figure 2-1. The topography of the area immediately surrounding the facility is presented in Figure 2-2.

### 3.2 Facility Process Description

The facility procures Douglas-fir, hemlock, and true fir logs from private and company-owned timberlands which are transported to the facility by truck and unloaded for on-site storage in the log yard or log pond.

Logs are sorted in the log yard, then sent for processing in the sawmill. Once in the log processing line, logs are debarked by a debarker and sent to a horizontal saw for further processing. A lug loader is used to separate and route individually cut boards, via lug chains, for the trimming and sorting area. The lumber is then routed to the trimming and sorting area via a mechanical belt.

After trimming and sorting, lumber is sent to one of six steam-heated lumber kilns for drying to an acceptable moisture content. The temperature for each lumber-drying kiln depends on the species of wood; the maximum dry-bulb drying temperature set point for any species is 200 degrees Fahrenheit. Each lumber-drying kiln processes Douglas-fir, hemlock, and true fir species. Lumber products are dried to an acceptable moisture content (typically less than 14 percent) prior to further processing. After kiln drying is complete, dried lumber is sent to the planer for shaping to final product dimensions—typically in lengths of between 6 feet and 10 feet. End seal and other wood treatments are applied to

portions of the kiln dried lumber. Final products are stacked and wrapped for storage and eventual shipment off site.

Wood residuals from the sawmill—including chips, sawdust, and planer shavings, referred to as furnish, are used as raw material for a hardboard product. The residuals are sent through a screening process to sort the furnish into material of acceptable size. Wax is added to the furnish via two rotary valves, then the furnish is steamed and softened in two steam-heated digesters. The furnish is further processed in two steam-heated pressurized refiners to produce wood fiber.

The refined fiber slurry is piped to a stock and mix chest where resin is introduced to the fiber. Following the stock and mix chests, the fiber is sent to a secondary refiner, then to the forming machine, where fibers pack together to form a wet mat. Water drains below the mat, assisted by a vacuum pump.

After forming, the mat is trimmed to size and conveyed to a steam-heated press. Emissions from the hardboard press are routed to a scrubber. After leaving the press, the cured panels are stacked, then transported to the rough warehouse for finishing. At the rough warehouse, finishing operations include cutting boards to size, sanding, and punch pressing for a portion of the boards. Additionally, surface coatings, including topcoats and basecoats, are applied to a portion of the hardboards at the paint line.

Steam from three Dutch oven hogged fuel boilers (the existing boilers) is used to provide heat for the lumber-drying kilns and the hardboard plant. Exhaust from the existing boilers can be routed between a dry electrostatic precipitator (ESP) or the fuel dryer, which exhausts to a wet scrubber. Wood residuals from the sawmill are used as fuel for the existing boilers. During the wet months, the residuals are sent through a rotary dryer (fuel dryer) to dehydrate the fuel to an acceptable moisture content for efficient combustion. Heat for the fuel dryer is provided by exhaust from the existing boilers.

The facility employs a wastewater treatment plant (WWTP) to repurpose wastewater from the hardboard plant operations. The WWTP uses an aeration basin and secondary clarifier to reduce the total suspended solids from the wastewater. Once treated, the wastewater is repurposed back to the facility for use in the hardboard plant.

### 3.3 Proposed Project

The proposed project includes the replacement of the existing sawmill with a new sawmill, which will process whole logs transported to the facility by truck. Logs will be stored in the existing yard adjacent to the proposed sawmill, where wheeled log loaders will transfer them into the sawmill process line. While the log trucks, loaders, and log storage yard are existing sources, they will have an increase in throughput to accommodate the capacity of the proposed sawmill. Once processed, lumber will either be stored near the sawmill for further drying in the existing kilns or sold as green lumber.

The proposed sawmill will be an enclosed system with sawing, and chipping processes fully contained within the building footprint. Exhaust from each process will be routed to a proposed central baghouse. The proposed sawmill will be capable of processing up to 120 Mbdft per hour of lumber and generate approximately 160 green-tons per hour of residual wood chips and 54 green-tons per hour of residual sawdust.

Wood residuals generated from the sawmill, including green chips and green sawdust, will be screened and sorted adjacent to the sawmill building. The proposed sawmill will use two identical screens. Material that meets size specifications will be transferred to existing truck bins or the existing fuel storage pile near the existing boilers, while oversized residuals (overs) will be conveyed to a chipper before re-entering the screens. Appropriately sized green chips will be pneumatically transported through enclosed piping to two high-efficiency cyclones before being deposited in existing, enclosed truck bins. Exhaust from the cyclones will exhaust directly to the atmosphere. Screened green sawdust will be pneumatically transported through enclosed piping to two existing, enclosed truck bins. Displaced air from each green sawdust truck bin will go through a fabric filtration system prior to exhausting to the atmosphere.

Green material that passes through screen 1 will be pneumatically transported directly to the identified truck bins. However, green material that passes through screen 2 may be pneumatically transported to either the identified truck bins or the existing boiler fuel storage pile.

A process flow diagram outlining the proposed sawmill is provided in the Construction ACDP application.

To accommodate the proposed project, Stimson is proposing to increase permitted annual throughputs for several existing sources at the facility. Annual throughput increases are being requested for the existing boilers, lumber kilns, wood fuel dryer, material handling baghouses and cyclones, lumber surface treatment, and vehicle traffic (fugitive road dust). Specific information on the proposed changes in throughputs for these existing processes is provided in the Construction ACDP application.

### 3.4 Additional Modifications

Stimson recently received updated environmental information for two resin products (Hardboard Adhesive [BK 276A30] and Hardboard resin [BK 254A20]) that are stored in four separate bulk storage tanks at the facility (existing resin storage tanks). The existing resin storage tanks meet the definition of categorically insignificant sources per OAR 340-200-0020(24)(jj) and are not included in the existing permit. However, there will be a slight change in toxic air contaminants (TACs) from the existing resin storage tanks which impact the facility with respect to the Cleaner Air Oregon (CAO) permitting program. Additional information on the proposed change in TAC emissions from the resin storage tanks is provided in Subsection 4.2.6, below.

Stimson is not requesting any modifications to the hardboard facility, emergency engines, fire pumps, other VOC bulk storage tanks, welding operations, or WWTP.

## 4 Emission Estimates and Model Sources

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The emissions inventory containing estimated emissions of criteria pollutants, greenhouse gases (GHG), hazardous air pollutants (HAPs), and toxic air contaminants (TACs) is presented in Appendix A

of the Construction ACDP application. The following subsections detail each proposed and modified (i.e., change in production rate) emission unit as part of the proposed project, and existing emissions units that will be modeled with the updated level 3 risk assessment.

## 4.1 Proposed Emission Units

### 4.1.1 Proposed Baghouse (SM-BGH)

PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from the proposed baghouse are provided in Appendix A of the Construction ACDP.

The exhaust stack for the proposed baghouse will be represented in the air dispersion model as a vertical point source with model ID **SM\_BGH**. Stack height and exhaust parameters for the proposed baghouse were provided by the proposed sawmill vendor. The proposed model source parameters and short-term PM<sub>2.5</sub> AAQS model emission rates for **SM\_BGH** are presented in Table 4-1.

### 4.1.2 Proposed Residuals Screens (SM-SCN1 and SM-SCN1)

Fugitive PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from the proposed screens are provided in Appendix A of the Construction ACDP.

The proposed screens will be represented in the air dispersion model as individual volume sources with model IDs **SM\_SCN1** and **SM\_SCN2**. Volume source dimensions and parameters for the two proposed screens were estimated using schematics provided by the proposed sawmill vendor. The proposed model source parameters and short-term PM<sub>2.5</sub> AAQS model emission rates for **SM\_SCN1** and **SM\_SCN2** are presented in Table 4-1.

### 4.1.3 Proposed Overs Chipper (SM-CHP)

Fugitive PM, PM<sub>10</sub>, PM<sub>2.5</sub>, volatile organic compound (VOC), and TAC emissions from the proposed overs chipper are provided in Appendix A of the Construction ACDP.

The proposed chipper will be represented in the air dispersion model as an individual volume source with model ID **SM\_CHP**. Volume source dimensions and parameters for the proposed chipper were estimated using schematics provided by the proposed sawmill vendor. The proposed model source parameters and short-term PM<sub>2.5</sub> AAQS model emission rates for **SM\_CHP** are presented in Table 4-1.

### 4.1.4 Proposed Truck Bin Cyclones (TB-CYC2 and TB-CYC2)

PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from the proposed truck bin cyclones are provided in Appendix A of the Construction ACDP.

The exhaust stacks for the proposed truck bin cyclones will be represented in the air dispersion model as a vertical point source with model IDs **TB\_CYC1** and **TB\_CYC2**. Stack height and exhaust parameters for the proposed truck bin cyclones were provided by the proposed sawmill vendor. The proposed model source parameters and short-term PM<sub>2.5</sub> AAQS model emission rates for **TB\_CYC1** and **TB\_CYC2** are presented in Table 4-1.

### 4.1.5 Proposed Truck Bin Baghouses (TB-BGH1 and TB-BGH2)

PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from the proposed truck bin baghouses are provided in Appendix A of the Construction ACDP.

The exhaust stacks for the proposed truck bin baghouses will be represented in the air dispersion model as a horizontal point source with model IDs **TB\_BGH1** and **TB\_BGH2**. Stack height and exhaust parameters for the proposed truck bin baghouses were provided by the proposed sawmill vendor. The proposed model source parameters and short-term PM<sub>2.5</sub> AAQS model emission rates for **TB\_BGH1** and **TB\_BGH2** are presented in Table 4-1.

### 4.1.6 Proposed Fuel Drop (DROP)

Fugitive PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from the proposed residual fuel drop are provided in Appendix A of the Construction ACDP.

The proposed fuel drop will be represented in the air dispersion model as an individual volume source with model ID **SM\_DROP**. Volume source dimensions and parameters for the proposed drop were estimated using information provided by Stimson. The proposed model source parameters and short-term PM<sub>2.5</sub> AAQS model emission rates for **SM\_DROP** are presented in Table 4-1.

## 4.2 Existing Emission Unit Modifications

The following are existing emission units that are part of the proposed project but are not being replaced or modified as part of the project. As a result, these emission units will only be included with the updated level 3 risk assessment.

### 4.2.1 Hogged-Fuel Boilers (H-BLR)

Criteria pollutants, GHG, HAP, and TAC emissions increases from the existing boilers related to the increase in annual usage are provided in Appendix A to the Construction ACDP application. Stimson is not proposing to alter the existing configuration or physically modify equipment or components of the existing boiler system. As a result, MFA proposes to use the same model source parameters and emissions allocations as was submitted with approved risk assessment.

The exhaust stacks for the existing boilers will be represented in the air dispersion model as individual point sources with unique labels (**BLR\_ESP**) and (**BLR\_SCR**). The model source parameters for the existing boilers are presented in Table 4-1, and the annual and daily TAC emissions are presented in Table 4-2 and Table 4-3, respectively. For the 24-hour (acute) assessment, the risk equivalent emission rates for **BLR\_ESP** and **BLR\_SCR** are provided in Table 4-4.

### 4.2.2 Fuel Dryer (S-400)

Criteria pollutant, GHG, HAP, and TAC emissions increases from the existing fuel dryer related to the increase in annual usage are provided in Appendix A to the Construction ACDP application. Stimson is not proposing to alter the existing configuration or physically modify equipment or components of the existing fuel dryer system. Therefore, TAC emissions for the existing fuel dryer will be emitted through **BLR\_SCR** as conducted in the approved risk assessment.

The source parameters for the **BLR\_SCR** are presented in Table 4-1, and the annual and daily TAC emissions are presented in Table 4-2 and Table 4-3, respectively. For the 24-hour (acute) assessment, the risk equivalent emission rate for **BLR\_SCR** is provided in Table 4-4.

### 4.2.3 Lumber Kilns (LBR-DK)

VOC, HAP, and TAC emissions increases from the existing lumber kilns related to the increase in annual usage are provided in Appendix A to the Construction ACDP application. Stimson is not proposing to alter the existing configuration or physically modify equipment or components of the existing fuel dryer system. As a result, MFA proposes to use the same model source parameters and emissions allocations as was submitted with approved risk assessment.

Kiln 1 will be represented as four volume sources with unique labels (**KILN1\_1** through **KILN1\_4**). Kilns 2 through 6 will be represented as 15 individual volume sources (three per kiln) with unique labels (**KILN2\_1** through **KILN2\_3**, **KILN3\_1** through **KILN3\_3**, **KILN4\_1** through **KILN4\_3**, **KILN5\_1** through **KILN5\_3**, and **KILN5\_1** through **KILN5\_3**). The thermal buoyancy derivations and emissions allocation for the 19 modeled sources for the kilns are provided in Table 4-5 and Table 4-6, respectively. In the case of the thermal buoyancy derivations, where ambient meteorological data were used (i.e., ambient temperature and wind speed), these values were updated based on the most current 5-year dataset used for the modeling. Additional information on this dataset is provided in Section 5, below.

The source parameters for the 19 kiln vents are presented in Table 4-1, and the annual and daily TAC emissions are presented in Table 4-2 and Table 4-3, respectively. For the 24-hour (acute) assessment, the risk equivalent emission rate for the kilns is provided in Table 4-4.

### 4.2.4 Planer Mill Cyclone (S-182)

PM, PM<sub>10</sub>, PM<sub>2.5</sub>, and TAC emissions increases from the existing green-wood chipper related to the increase in annual usage are provided in Appendix A to the Construction ACDP application. As identified in the approved risk assessment, TAC emissions from the existing green-wood chipper are exhausted through the planer cyclone. Stimson is not proposing to alter the existing configuration or physically modify equipment or components of the existing green-wood chipper or planer mill cyclone. As a result, MFA proposes to use the same model source parameters for **S\_CYC** as was submitted with approved risk assessment.

The point source parameters for the **S\_CYC** are presented in Table 4-1, and the annual and daily TAC emissions are presented in Table 4-2 and Table 4-3, respectively. For the 24-hour (acute) assessment, the risk equivalent emission rate for **S\_CYC** is provided in Table 4-4.

### 4.2.5 Lumber Surface Treatment (MB-VOC)

Fugitive VOC, HAP, and TAC emissions increases from the existing lumber surface protection application related to the increase in annual usage are provided in Appendix A to the Construction ACDP application. Stimson is not proposing to alter the existing configuration or physically modify equipment or components of the existing lumber surface protection application system. As a result, MFA proposes to use the same model source type (volume) and release parameters for **LSP** as was submitted with approved risk assessment.

The volume source parameters for the **LSP** are presented in Table 4-1, and the annual and daily TAC emissions are presented in Table 4-2 and Table 4-3, respectively. For the 24-hour (acute) assessment, the risk equivalent emission rate for **LSP** is provided in Table 4-4.

## 4.2.6 Resin Storage Tanks

Fugitive TAC emissions from the existing resin storage tanks are provided in Appendix A to the Construction ACDP application. The hardboard adhesive [BK 276A30] is stored in tanks 1, 2, and 3, which correspond to TEU ID's **RESIN1**, **RESIN2**, and **RESIN3**, respectively. MFA proposes to use the same model source parameters for these TEUs as was submitted in the approved risk assessment.

The hardboard resin [BK 254A20] is stored in a fourth tank, which is located adjacent to the hardboard white water tank inside a room on the west side of the hardboard plant. Fugitive TAC emissions from standing and working losses can enter the atmosphere via a bay door that is periodically opened and located near the tanks. This bay door was identified as (TEU ID **WHITE**) in the approved risk assessment. As such, MFA proposes to add emissions from the fourth resin tank to existing TEU ID **WHITE** in the dispersion model.

The volume source parameters for the existing resin storage tanks and the bay door are presented in Table 4-1, and the annual and daily TAC emissions are presented in Table 4-2 and Table 4-3, respectively. For the 24-hour (acute) assessment, the risk equivalent emission rates for the existing resin storage tanks are provided in Table 4-4.

## 4.3 Other Existing Toxic Emission Units

The following devices and activities are not part of or impacted by the proposed project but are existing toxic emission units (TEUs) that were included with the approved risk assessment. MFA is proposing to include these TEUs with the revised level 3 risk assessment to demonstrate that total facility-wide cancer and noncancer risk will not exceed acceptable levels when including the proposed project.

### 4.3.1 Refiners

MFA proposes to use the same model source parameters for the refiner TEUs (**REF\_RV** and **REF\_S5**) as was submitted in the approved risk assessment.

The point source parameters for **REF\_RV** and **REF\_S5** are presented in Table 4-1, and the annual and daily TAC emissions are presented in Table 4-2 and Table 4-3, respectively. For the 24-hour (acute) assessment, the risk equivalent emission rates for refiner TEUs are provided in Table 4-4.

### 4.3.2 Forming Line

MFA proposes to use the same model source parameters for the forming line TEUs (**FORM\_STK** and **FORM\_FUG**) as was submitted in the approved risk assessment.

The point source parameters for **FORM\_STK** and the volume source parameters for **FORM\_FUG** are presented in Table 4-1, and the annual and daily TAC emissions are presented in Table 4-2 and Table 4-3, respectively. For the 24-hour (acute) assessment, the risk equivalent emission rates for forming line TEUs are provided in Table 4-4.

### 4.3.3 Hardboard Press

MFA proposes to use the same model source parameters for the hardboard press TEUs (**PV\_STK** and **HPVUV\_FUG**) as was submitted in the approved risk assessment.

The point source parameters for **PV\_STK** and the volume source parameters for **HPVUV\_FUG** are presented in Table 4-1, and the annual and daily TAC emissions are presented in Table 4-2 and Table 4-3, respectively. For the 24-hour (acute) assessment, the risk equivalent emission rates for hardboard press TEUs are provided in Table 4-4.

### 4.3.4 Hardboard Paint Application

MFA proposes to use the same model source parameters for the top and bottom paint application TEU (**PAINT**) as was submitted in the approved risk assessment.

The volume source parameters for **PAINT** are presented in Table 4-1, and the annual and daily TAC emissions are presented in Table 4-2 and Table 4-3, respectively. For the 24-hour (acute) assessment, the risk equivalent emission rates for the top and bottom paint application TEU are provided in Table 4-4.

### 4.3.5 Hardboard Wastewater

MFA proposes to use the same model source parameters for the hardboard wastewater system TEUs (**WHITE**, **MACH**, and **HEADBOX**) as was submitted in the approved risk assessment.

The point source parameters for **HEADBOX** and the volume source parameters for **WHITE** and **MACH** are presented in Table 4-1, and the annual and daily TAC emissions are presented in Table 4-2 and Table 4-3, respectively. For the 24-hour (acute) assessment, the risk equivalent emission rates for **WHITE**, **MACH**, and **HEADBOX** is provided in Table 4-4.

### 4.3.6 Wastewater Treatment

MFA proposes to use the same model source parameters for the WWTP TEUs (**HYDRO**, **SCR\_HYDRO**, **CLAR**, **PIT**, **ABASE**, **S\_POND**, **R\_POND**, **SURGE**, and **E\_POND**) as was submitted in the approved risk assessment.

The area source parameters for the WWTP TEUs are presented in Table 4-1, and the annual and daily TAC emissions are presented in Table 4-2 and Table 4-3, respectively. For the 24-hour (acute) assessment, the risk equivalent emission rates for the WWTP TEUs are provided in Table 4-4.

### 4.3.7 Gas Storage Tank

MFA proposes to use the same model source parameters for the gas bulk storage tank TEU (**GAS**) as was submitted in the approved risk assessment.

The volume source parameters for the gas bulk storage tank TEU are presented in Table 4-1, and the annual and daily TAC emissions are presented in Table 4-2 and Table 4-3, respectively. For the 24-hour (acute) assessment, the risk equivalent emission rate for the gas bulk storage tank TEU is provided in Table 4-4.

### 4.3.8 Emergency Engines

MFA proposes to use the same model source parameters for the diesel-fueled emergency engine TEUs (**BGEN**, **FIRE**, and **EGEN01**) as was submitted in the approved risk assessment.

The point source parameters for the emergency engine TEUs are presented in Table 4-1, and the annual and daily TAC emissions are presented in Table 4-2 and Table 4-3, respectively. For the 24-hour (acute) assessment, the risk equivalent emission rates for the emergency engine TEUs are provided in Table 4-4.

### 4.3.9 Welding Activities

MFA proposes to use the same model source parameters for welding activity TEU (**WELD**) as was submitted in the approved risk assessment.

The volume source parameters for the welding activities TEU are presented in Table 4-1, and the annual and daily TAC emissions are presented in Table 4-2 and Table 4-3, respectively. For the 24-hour (acute) assessment, the risk equivalent emission rate for the welding activities TEU is provided in Table 4-4.

### 4.3.10 Babbitt Pot

MFA proposes to use the same model source parameters for babbitt pot TEU (**BPOT**) as was submitted in the approved risk assessment.

The point source parameters for the babbitt pot TEU is presented in Table 4-1, and the annual and daily TAC emissions are presented in Table 4-2 and Table 4-3, respectively. For the 24-hour (acute) assessment, the risk equivalent emission rate for the babbitt pot TEU is provided in Table 4-4.

## 5 Air Dispersion Modeling Methodology

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The following subsections detail the proposed air dispersion model methodology, including input parameters and assumptions applicable to the short-term AAQS demonstration and updated level 3 risk assessment dispersion model.

### 5.1 Model Selection

MFA proposes to execute the dispersion model using the model versions shown in Table 5-1 below. Lakes Environmental, a third-party overlay software, will be used to execute the dispersion model.

**Table 5-1. Proposed Model Selection**

Model	Model Version
AERMOD	24142
AERMET	24142
AERMAP	18081
AERSURFACE	24142

Model	Model Version
AERMINUTE	15272
BPIP	04274

## 5.2 Meteorological Data

MFA proposes to use data from the same meteorological stations and sources, as shown in Table 5-2, that were used in the approved risk assessment

**Table 5-2. Meteorological, Land Use, and Terrain Data**

Dataset	Data Reference
Surface	
ASOS 1-minute Precipitation	Station ID 94285 for Portland-Hillsboro Airport, Oregon (National Oceanic and Atmospheric Administration)
Upper Air	Station ID 24232 for Salem, OR (National Oceanic and Atmospheric Administration/ Earth System Research Laboratory Radiosonde Database)
Land Use	State of Oregon National Land Cover Data Set 2023 (U.S. Geological Survey)
Terrain	1/3-arc seconds with horizontal resolution of 10 meters (U.S. Geological Survey National Elevation Dataset)

MFA proposes to update the meteorological dataset to be representative of the current 5-year period of January 1, 2020, through December 31, 2024 (updated meteorological dataset). All AERMET, AERMINUTE, and AERSURFACE processing methods will be consistent with the approved risk assessment. A summary of the processing settings that will be used for AERMET is shown in Table 5-3.

**Table 5-3. AERMET Settings**

Parameter	Setting	Reference
Randomize Wind Directions (Yes/No)	No	EPA 2013a
Missing Cloud Cover Substitution (Yes/No)	Yes	EPA 2024a
Missing Temperature Substitution (Yes/No)	Yes	EPA 2024a
Minimum Wind Speed (m/s)	0.50	EPA 2013a
Low Wind Option Enabled? (Yes/No)	Yes	DEQ 2022

An analysis of the missing hours for the updated meteorological dataset was performed by running the AERMET QA Tool. As shown in Table 5-4, all quarters in the updated meteorological dataset meet the 90 percent data completeness criteria specified in the U.S. Environmental Protection Agency (EPA) Monitoring Guidelines<sup>1</sup>. A windrose identifying the prevailing wind direction for the updated meteorological dataset is provided in Figure 5-1.

<sup>1</sup> EPA. 2000. Meteorological Monitoring Guidance for Regulatory Modeling Applications. EPA453/R-99-005. U.S. Environmental Protection Agency. February.

## 5.3 AERSURFACE Land Use and Terrain

State of Oregon National Land Cover Data Set 2023 land cover class definitions, along with concurrent percent impervious surface and percent tree canopy<sup>2</sup> data, were downloaded from the U.S. Geological Survey, and processed using the AERSURFACE settings described in Table 5-5, to generate the surface characteristics necessary to run AERMET.

**Table 5-5. Proposed AERSURFACE Settings**

Parameter	Setting
Study radius for surface roughness	1.0 kilometer
Are the surface data collected at an airport?	Yes
Should continuous snow cover be assumed?	No
Is this an arid region?	No
Number of sectors	12
Months assumed to constitute “winter”	December, January, and February
Months assumed to constitute “Spring”	March, April, and May
Months assumed to constitute “Summer”	June, July, and August
Months assumed to constitute “Autumn”	September, October, and November
Period for land use calculations	Monthly

Soil moisture conditions were determined following the methodology set forth in Section 3.2.8 of the EPA User’s Guide for the AERSURFACE Tool, dated November 2024 (AERSURFACE User’s Guide; EPA 2024b). MFA proposes to use precipitation data measured at the Portland-Hillsboro Airport station (Hillsboro met station) in Hillsboro, Oregon. Although the Hillsboro met station only has 26-consecutive years of available data, MFA believes this period is sufficient to characterize soil moisture conditions for dispersion modeling purposes. The Hillsboro met station was chosen in lieu of using precipitation data measured at the Dilly Station in Gaston, Oregon, as was done in the approved risk assessment, as the Hillsboro met station is the same in-situ station used for AERMET input.

Annual precipitation data for each year of the updated meteorological data set were reviewed and compared against the 26-year climatological record to determine the representative soil moisture condition for each modeling year. As shown in Table 5-6, the annual precipitation remained varied between the lower 30th percentile to the upper 70<sup>th</sup> percentile of the 26-year climatological record.

MFA will execute the air dispersion model using rural dispersion coefficients. To make this determination, MFA followed the land-use procedure, as recommended in Section 7.2.1.1(b) of Appendix W to Part 51 *Guideline on Air Quality Models*, to conclude that less than 50 percent of the land use in the modeling domain is represented by the urban land-use type.

## 5.4 Emission Unit Locations

The locations of each proposed emissions unit to be included in the level 3 risk assessment and short-term PM<sub>2.5</sub> AAQS dispersion models are shown in Figure 5-2 and Figure 5-3, respectively.

<sup>2</sup> The most current available tree canopy for the modeling domain is from the 2016 calendar year.

For volume sources that are located on or adjacent to buildings, initial horizontal dimension and initial vertical dimension were calculated using the EPA method specified in the *User’s Guide for the Industrial Source Complex Dispersion Models—Volume II—Description of Model Algorithms* (1995). Release heights were set to half the building height. Release heights for the kilns were adjusted to account for thermal buoyancy using the methods discussed in Section 4.2.3 of this modeling and risk assessment report.

## 5.5 Building Downwash

The current version of the Building Profile Input Program, shown in Table 5-1, will be used. The locations for structures that influence downwash are presented in Figure 5-4. Table 5-7 presents a summary of the proposed building heights to be included in the air dispersion model.

## 5.6 AAQS and Level 3 Risk Assessment Model Receptor Locations and Terrain

Receptors for the short-term AAQS compliance demonstration dispersion model and level 3 risk assessment will be defined consistent with Section 2.4 of the DEQ’s guidance document (DEQ Recommended Procedures) (DEQ 2022) as shown in Table 5-8 below. Table 5-9, provided in electronic version only, shows all receptor locations and their exposure classification.

**5-8: Proposed Receptor Locations**

Receptor Spacing (meters)	Receptor Distance (meters)
25	Along the property boundary and out to at least 200 meters from the property boundary.
50	200 to 1,000
100	1,000 to 2,000
200	2,000 to 5,000
500	5,000 to 10,000

Figure 5-5 presents the proposed receptor spacing and locations within the modeling domain. Figure 5-6 presents the proposed receptor locations in the area immediately surrounding the employee access area. As shown in Figure 5-6, the property boundary has been updated from the approved risk assessment to exclude an area near the east entrance of the facility. This area is being leased to Fox Lumber Sales and therefore, will be considered worker exposure locations in the level 3 risk assessment and short-term PM<sub>2.5</sub> AAQS compliance demonstration. Due to the change in property boundary, fence line receptors have moved slightly (varying up to 0.5 meters) relative to the receptors in the approved risk assessment to accommodate the 25-meter spacing.

Receptors that fall along roadway and/or rail right-of-way interstitial spaces are identified in black in Figure 5-5 and Figure 5-6. As described in Section 6.2.1 below, MFA proposes to not assess risk in the level 3 risk assessment at these locations. However, these receptors will be included in the short-term PM<sub>2.5</sub> AAQS compliance demonstration.

Terrain elevations for proposed model receptors, emission unit base elevations, and downwash structures base elevations will be derived from the US Geological Survey National Elevation Dataset as shown in Table 5-2 and processed using the current version of AERMAP.

## 5.7 Sensitive Receptors – CAO Only

MFA reviewed an area within 1.5 kilometers of the facility property boundary to identify whether there were any locations considered to be sensitive areas (e.g., schools, hospitals). Results of the review indicated that there are no sensitive locations within 1.5 kilometers of the facility. The nearest child exposure location was determined to be a school located 3.8 kilometers from the facility. To assess cancer and noncancer risk at the child exposure location, a discrete receptor will be placed at the location shown in Table 5-10.

### 5-10: Identification of Nearest Child Exposure Location

UTM Coordinates (m)		Child Exposure Location
Easting	Northing	
488,733.77	5,031,352.85	Gaston Union Jr./Sr. High School

**Notes**  
 UTM = universal transversal mercator  
 m = meter

## 5.8 Proposed Model Emission Rates – CAO Only

MFA proposes to execute the dispersion model using unit emission rates for annual assessments (excess cancer and chronic noncancer) for significant toxic emission units (TEUs). The maximum modeled unit concentration in micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) at each modeled receptor for the annual averaging period will be considered a modeled “dispersion factor” in units of  $\mu\text{g}/\text{m}^3$  per grams per second (g/s). When this dispersion factor is multiplied by the g/s TAC emission rate for the modeled TEU, the result is the modeled concentration of the TAC. Therefore, a single unit emission rate model result can be used to calculate the modeled concentration for each TAC. The dispersion factors, in combination with TAC emission rates for each TEU in g/s and the risk-based concentrations (RBCs) in  $\mu\text{g}/\text{m}^3$  set forth under OAR 340-245-8010 Table 2, will be used to conduct the chronic cancer and noncancer level 3 risk assessments. The proposed chronic model emission rates for each TEU are provided in Table 4-2.

For the 24-hour (acute) assessment, MFA developed risk equivalent emission rates for each TEU. The proposed risk equivalent emission rates were calculated by dividing the individual TAC emission rate for each TEU by their respective acute RBC. The resulting value for each TAC was then summed together to create a total risk equivalent emission rate for the TEU. This process was repeated for each TEU at the facility. The risk equivalent emission rates will be modeled for the 24-hour averaging period to assess the cumulative acute risk from the facility. The proposed risk equivalent emission rates are provided in Table 4-4.

## 6 Short-term AAQS Assessment

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As stated in Section 2, the facility must demonstrate compliance with the PM<sub>2.5</sub> 24-hour AAQS as part of the permitting process. The facility is not located in a Class I designated area under OAR 340-204-0050. As a result, the facility is considered to be located in a Class II designated area for purposes of dispersion modeling per OAR 340 204 0060(1)(a).

### 6.1 Cumulative Impact Assessment

MFA will execute the dispersion model to predict the concentrations from the proposed project emissions using the model emission rates from Table 4-1 and the competing source emission rates discussed in section 6.3. Predicted concentrations from the dispersion model will be added to the secondary impacts, as discussed in Section 6.2, and background concentration, as discussed in Section 6.4, resulting in a design value. The design value will be compared to the short-term PM<sub>2.5</sub> AAQS. The modeling input and output files are provided electronically as Attachment A for review along with the submittal of this modeling report and risk assessment report.

### 6.2 Secondary Impacts

Emissions of total nitrogen oxides (NO<sub>x</sub>) and sulfur dioxide (SO<sub>2</sub>) contribute to the formation of secondary PM<sub>2.5</sub> in the form of nitrates and sulfates. The formation of secondary PM<sub>2.5</sub> has an additive impact on modeled concentrations of as emitted, direct PM<sub>2.5</sub>. MFA proposes to follow the qualitative Tier 1 approach to determine impacts of secondary PM<sub>2.5</sub> formation according to EPA's memorandum (EPA 2019a).

MFA used the most conservative secondary PM<sub>2.5</sub> values shown in Table 4-1 of the guidance document (EPA 2019a) to calculate site-specific secondary formation impacts as shown in Table 6-1. MFA proposes adding the PM<sub>2.5</sub> 24-hour secondary impact concentration shown in Table 6-1 to the direct PM<sub>2.5</sub> concentration predicted for the short-term PM<sub>2.5</sub> AAQS assessments.

### 6.3 Competing Source

Table 6-2 presents the modeled release parameters and emission rates for the competing source inventory provided by the DEQ on February 27, 2025. Since the time the competing source inventory was provided by the DEQ, proposed annual PM<sub>2.5</sub> emissions from the proposed project have decreased significantly. As a result, MFA reassessed the competing source inventory using the "Range of Influence formula" analysis described in OAR 340-225-0020(10). MFA determined that one of the competing sources provided by DEQ, at a distance of approximately 10.6 kilometers from the facility, is outside the range of influence and therefore, has been removed from consideration as a competing source.

Figure 5-3 presents the location for the single modeled competing source for the short-term PM<sub>2.5</sub> AAQS compliance demonstration.

## 6.4 Background Concentrations

Consistent with Section 3.4 of the DEQ Recommended Procedures and in anticipation of dispersion modeling, MFA obtained background concentrations from the Northwest International Air Quality Environmental Science and Technology (e.g., NW AIRQUEST) Consortium lookup tool. MFA used the average of the four nearest values surrounding the facility location to estimate the proposed background concentrations presented in Table 6-3.

# 7 Risk Assessment Work Plan

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The following subsections detail the proposed inputs and assumptions that were used in support of the revised Level 3 Risk Assessment developed using the same methodology outlined in the approved risk assessment. However, with a slightly different assessment boundary as described in Section 5.6.

## 7.1 Conceptual Site Model

Sections 2 through 5 discuss the facility location, process description, TEUs, and TAC emission estimates to satisfy the requirements for a conceptual site model set forth under OAR 340-245-0210(2)(a). Exposure locations are described in more detail in Section 7.2 below. All TEUs will be classified as Significant TEUs and therefore, aggregate and gas exempt TEUs are not applicable for the facility.

### 7.1.1 Non-Exempt TEUs

Calculated risks associated with Significant TEUs will be compared with the applicable RALs. A Level 3 Risk Assessment will be conducted that includes all facility TEUs.

## 7.2 Exposure Assessment

### 7.2.1 Land-Use Zoning Classification Data for Determining Exposure Types

The Department of Land Conservation and Development's statewide zoning data were reviewed to determine land-use classifications for areas in the modeling domain. The Oregon statewide zoning classifications provide the basis for the initial categorization of exposure classifications (i.e., residential, nonresidential worker, nonresidential child, or acute only).

The zoning data were further evaluated against local data such as the Washington County zoning and school-location information. MFA also reviewed aerial imagery, using Esri ArcGIS and Google Earth software to determine whether the existing zoning information reflects actual land use and the corresponding exposure type categorization.

Using the same review process as was conducted in the approved risk assessment, MFA indicated that multiple proposed receptor locations fall within roadway and/or rail right-of-way interstitial spaces, which are identified in black in **Figure 5-5** and **Figure 5-6**. These locations are proposed for dispersion modeling to maintain a uniform receptor grid. MFA does not propose to conduct risk evaluations for any receptor locations in roadways or rail rights-of-way that fall within the 25m and 50m spacing. In the crosswalk-of-receptors, Table 5-8, these locations are labeled as “Risk Not Assessed,” even though they will be modeled. Exposure locations that are located within a roadway and/or rail right-of-way outside of the 50m grid will be assigned the same as the nearest exposure category.

Figure 7-1 presents the existing land-use zoning identified for the modeling domain, and Figure 7-2 is provided for the area immediately surrounding the facility. Figures 7-3 and 7-4 present the corresponding exposure location categorization for the modeling domain and the immediate area surrounding the facility, respectively.

## 7.2.2 Exposure Pathways

MFA assumes that predicted cancer and noncancer risk (i.e., chronic and acute hazard index) resulting from facility TEUs will not have additional exposure pathways (i.e., ingestion or injection) other than those already accounted for in each published RBC. Moreover, based on a review of land-use zoning classifications and aerial imagery, there are no known locations that might present additional exposure pathways that require further analysis. Since no additional exposure pathways have been observed, a Level 4 Risk Assessment is not warranted.

## 7.2.3 Risk-Based Concentrations

Excess cancer risk and chronic and acute noncancer risk will be assessed using the most current RBCs available as shown in OAR 340 245 8010 Table 2. The TACs from the emissions inventory and corresponding RBCs to be included in the Level 3 Risk Assessment are presented in Table 7-1.

## 7.3 Risk Estimates

As described in Section 5.8, a single dispersion model will be executed using a unit emission rate of 1 g/s for each TEU for annual (chronic cancer and noncancer) assessments. For the 24-hour (acute) assessment, MFA developed risk equivalent emission rates for each Significant TEU, as shown in Table 4-4.

### 7.3.1 Example Calculation—Level 3 Risk Assessment

Example calculations for estimating excess cancer risk and chronic noncancer hazard index for a single proposed exposure location are presented in Equation 1 and Equation 2 per OAR 340-245-0210(2)(c).

**Equation 1.**

$$\text{Excess Cancer Risk (chances-in-a-million)} = \sum \frac{(\text{TAC annual emission rate [g/s]} \times (\text{proposed TEU dispersion factor } \left[ \frac{\mu\text{g}/\text{m}^3}{\text{g/s}} \right]))}{(\text{applicable RBC at exposure location } [\mu\text{g}/\text{m}^3])}$$

**Equation 2.**

$$\text{Chronic Noncancer Hazard Index} = \sum \frac{(\text{TAC annual emission rate [g/s]} \times (\text{proposed TEU dispersion factor } \left[ \frac{\mu\text{g}}{\text{m}^3} \right]))}{(\text{applicable RBC at exposure location } [\mu\text{g}/\text{m}^3])}$$

The total facility excess cancer risk and chronic noncancer hazard index will be derived by summing each individual TAC risk contribution at each proposed exposure location.

## 7.4 Uncertainty Analysis

Although the proposed Level 3 Risk Assessment will be conducted using the most accurate and current information, there are various levels of uncertainty associated with the proposed risk assessment. Per OAR 340 245 0210(2)(d), known quantitative and qualitative uncertainties with the proposed Level 3 Risk Assessment include, but may not be limited to, the following:

### Acute Assessments:

- To assess acute noncancer risk (i.e., acute hazard index), the full 24-hour exposure duration was assumed. While it is unlikely a person would be at most of the exposure locations for 24 consecutive hours, this method provides a worst-case potential exposure duration for an individual at these locations. For example, if an employee at an identified acute exposure location only works a single, eight-hour shift, the exposure would only be a third of what is being assumed in the Level 3 Risk Assessment. **Hence, the Level 3 Risk Assessment may overestimate acute noncancer risk due to the 24-hour exposure duration assumption for chemicals with RBCs based on Toxicity Reference Values with an exposure period of 24-hours or more. Conversely, the Level 3 Risk Assessment may underestimate acute noncancer risk for Toxicity Reference Values with an exposure period of less than 24 hours because the model is executed for the 24-hour averaging period.**
- The Level 3 Risk Assessment will be conducted assuming each TEU at the facility is operating at maximum potential to emit, simultaneously. For example, the three boilers typically do not need to operate at the maximum potential to emit to satisfy the steam requirements of the facility. It is highly unlikely that all TEUs at the facility will operate at their maximum potential to emit for a 24-hour period simultaneously. **Therefore, the Level 3 Risk Assessment likely overestimates acute noncancer risk due to unrealistic operating conditions.**
- The Level 3 Risk Assessment will rely on modeling using a five-year period of hourly meteorological data. Some meteorological conditions, which may only occur a few days or less in a five-year period, result in worst-case dispersion characteristics. It is extremely unlikely that these infrequent meteorological conditions would occur at the same time that the facility is simultaneously operating all TEUs at maximum potential to emit. **Therefore, the Level 3 Risk Assessment likely overestimates acute noncancer risk because of the improbability of facility operations at maximum potential to emit aligning with worst-case meteorological conditions.**

### Cancer and Chronic Noncancer Assessments:

- The RBCs developed by the DEQ for excess cancer risk and chronic noncancer risk assume a 70-year exposure duration for 24 hours per day. It is unlikely that a person would remain at the same residence or in areas potentially impacted by emissions covered by the CAO program for 70 consecutive years for 24 hours per day. The risk assessments also account for a person being exposed to the local facility emission rate for the entire exposure duration (i.e., 70 years). **Therefore, the Level 3 Risk Assessment will overestimate cancer and chronic noncancer risk due to the unrealistic exposure duration assumption.**

- The excess cancer risk and chronic noncancer risk assessments were performed assuming that all TEUs operate for the course of the calendar year at their potential to emit levels. It is physically impossible that the facility could operate several of the facility TEUs at maximum potential to emit for an entire year without shutdown time for maintenance and cleaning, such as the boilers. **Therefore, the Level 3 Risk Assessment will overestimate cancer and chronic noncancer risk due to the overestimation of emissions resulting from continuous facility operation at potential to emit levels.**

#### All Assessments:

- Only excess cancer risk and chronic and acute noncancer hazard index from TACs that have RBCs published by the DEQ will be assessed. Table 7-2 presents a list of the TACs emitted from the facility TEUs that do not have RBCs published by the DEQ. **As a result, the Level 3 Risk Assessment does not assess cancer and/or noncancer risk associated with those TACs that do not yet have an associated RBC. However, the development of RBCs generally has a level of conservatism that may overestimate cancer and/or noncancer risk from TACs with known RBCs.**
- Temporal variability in meteorological conditions (e.g. ambient temperature and wind speed) and kiln operating conditions (kiln drying temperature, intake airflow) influence how emissions are released (i.e., plume rise) from the lumber kilns over the course of the batch drying time. Because emissions from the kiln are estimated using the kiln high temperature setpoint, plume rise from the kiln is also estimated using this temperature. The best available ambient temperature and wind data from the meteorological dataset used for the dispersion model were used to calculate plume rise from the kilns, as shown in Table 4-5. **As a result of the temporal variability of plume rise from the lumber kilns, the Level 3 Risk Assessment may over- or under-predict risk from the kilns during periods of variable meteorological and kiln operational conditions.**
- Emissions data for lumber kilns are representative of emissions over the duration of the drying cycle for a given kiln temperature setpoint. Due to the nature of the drying cycle, the temperature within the kiln will vary, but emissions are estimated based on the highest kiln setpoint temperature. Testing data demonstrates that the kiln emissions will decrease with decreasing temperature. **As a result of the varying temperature, the lumber kilns over the course of the drying cycle, and resulting emissions, the Level 3 Risk Assessment may over- or under-predict risk from the kilns.**

## 8 Modeling Results

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Preliminary results of the short-term AAQS analysis and the Level 3 Risk Assessment using the proposed model inputs, as described in Section 2 through 7, are provided below.

### 8.1 AAQS Modeling Results

Results of the short-term AAQS modeling analysis for the PM<sub>2.5</sub> 24-hour are presented in Table 8-1. As shown in Table 8-1, the design value for PM<sub>2.5</sub> 24-hour is below the AAQS of 35 ug/m<sup>3</sup>. These results show the facility does not cause or contribute to a new exceedance of the short-term PM<sub>2.5</sub> AAQS.

## 8.2 Level 3 Risk Assessment Results

A summary of the modeled dispersion factors for each significant TEU is provided in Table 8-2. The modeled concentrations at the location of the maximum predicted risk for each modeled TEU are presented in Table 8-3 for significant TEUs.

The results of the Level 3 Risk Assessment were compared to the current RALs published in OAR 340-245-8010 Table 1. As shown in Table 1-2 and Table 8-3, the maximum predicted excess child cancer risk, child and chronic and acute noncancer hazard indices are below the community engagement RAL for existing sources per OAR 340-245-8010 Table 1. Further, the proposed project will not result in an increase of facility-wide risk beyond any RAL that was identified as part of the CAO permitting program.

## 9 Closing

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MFA looks forward to working with the DEQ throughout the permit application process. If there are any questions or comments regarding this document, please contact Andrew Rogers, Project Meteorologist with MFA at (503) 407-6406.

# References

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# Limitations

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The services undertaken in completing this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.

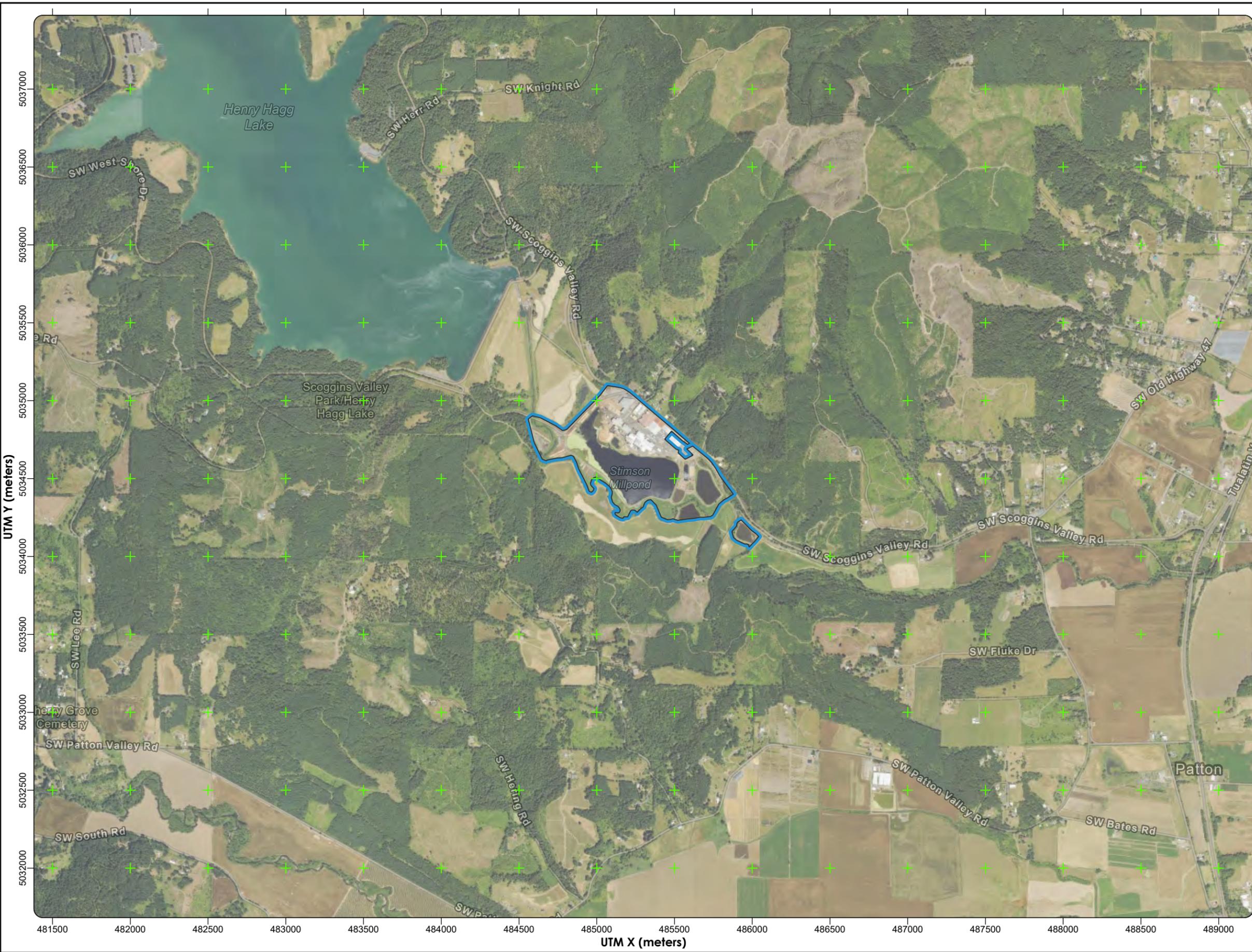
# Figures

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Path: X:\0066.03\Stimson Timber\011\Pro\WD066.03\_01\_004.aprx, Fig 2-1 Aerial Photography of Facility  
Print Date: 3/21/2025  
Reviewed By: aragors  
Produced By: sturner  
Project: MD066.03.011



### Figure 3-1 Aerial Imagery of Facility

Stimson Lumber Company  
Forest Grove Complex  
Gaston, OR

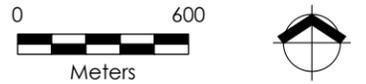
#### Legend

-  Exposure Assessment Boundary
-  UTM 500-Meter Grid Mark

#### Key Map



**Note**  
UTM = universal transverse mercator  
projection.



**Data Sources**  
Aerial photography from the U.S. Department of  
Agriculture; reference labels from Esri.

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Path: X:\0666.03 Stimson Timber\011\Pro\MD066.03\_011\_004.aprx\Fig 2-2 Local Topography



### Figure 3-2 Local Topography

Stimson Lumber Company  
Forest Grove Complex  
Gaston, OR

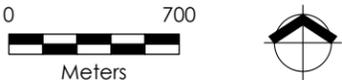
#### Legend

- Exposure Assessment Boundary
- UTM 1-Kilometer Grid Mark

#### Key Map



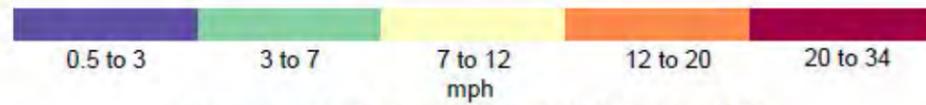
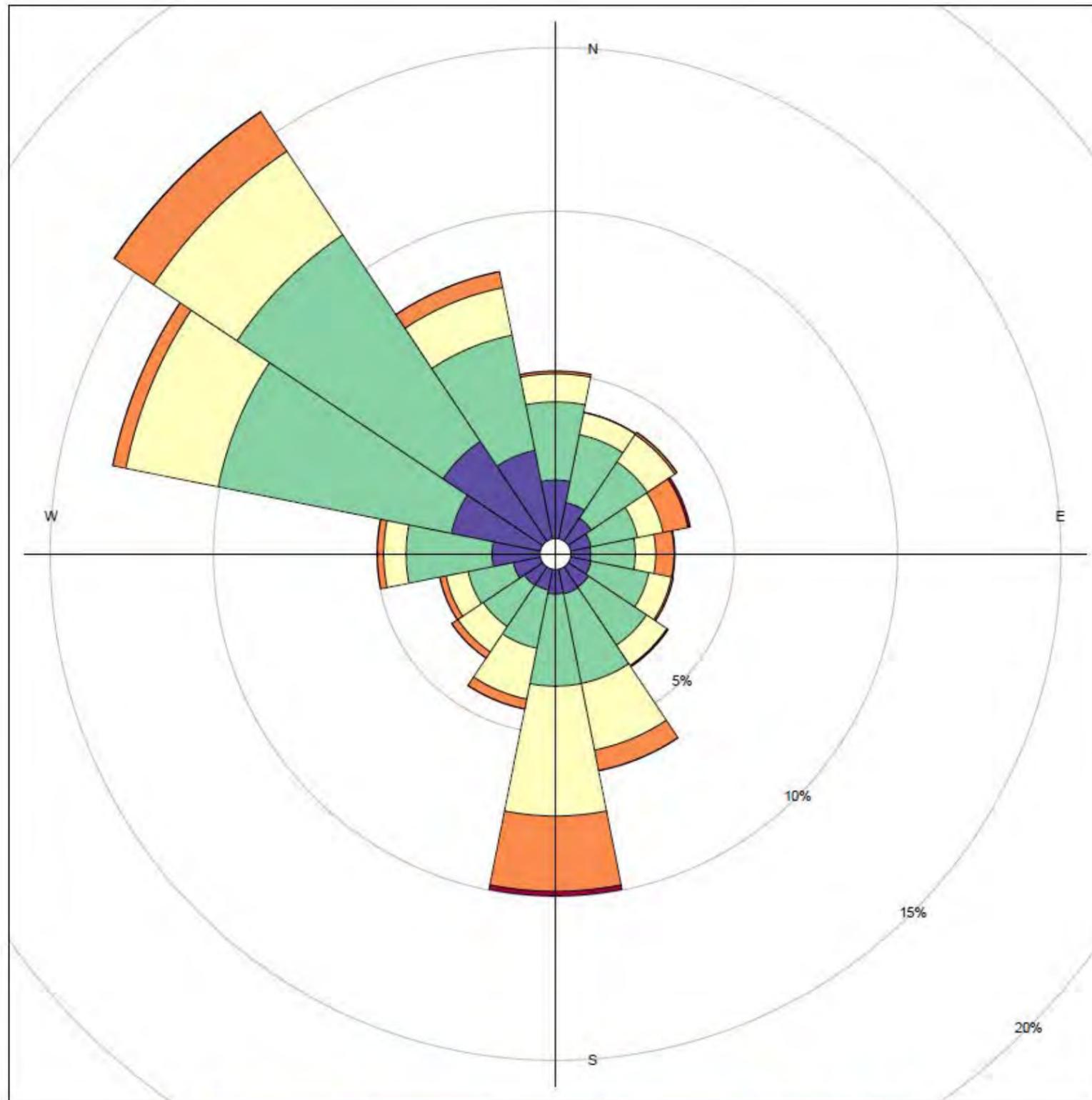
**Note**  
UTM = universal transverse mercator projection.



**Data Source**  
Topographic basemap from Esri.

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Frequency of counts by wind direction (%)

### Figure 5-1 Wind Rose

Stimson Lumber Company  
Forest Grove Complex  
Gaston, OR

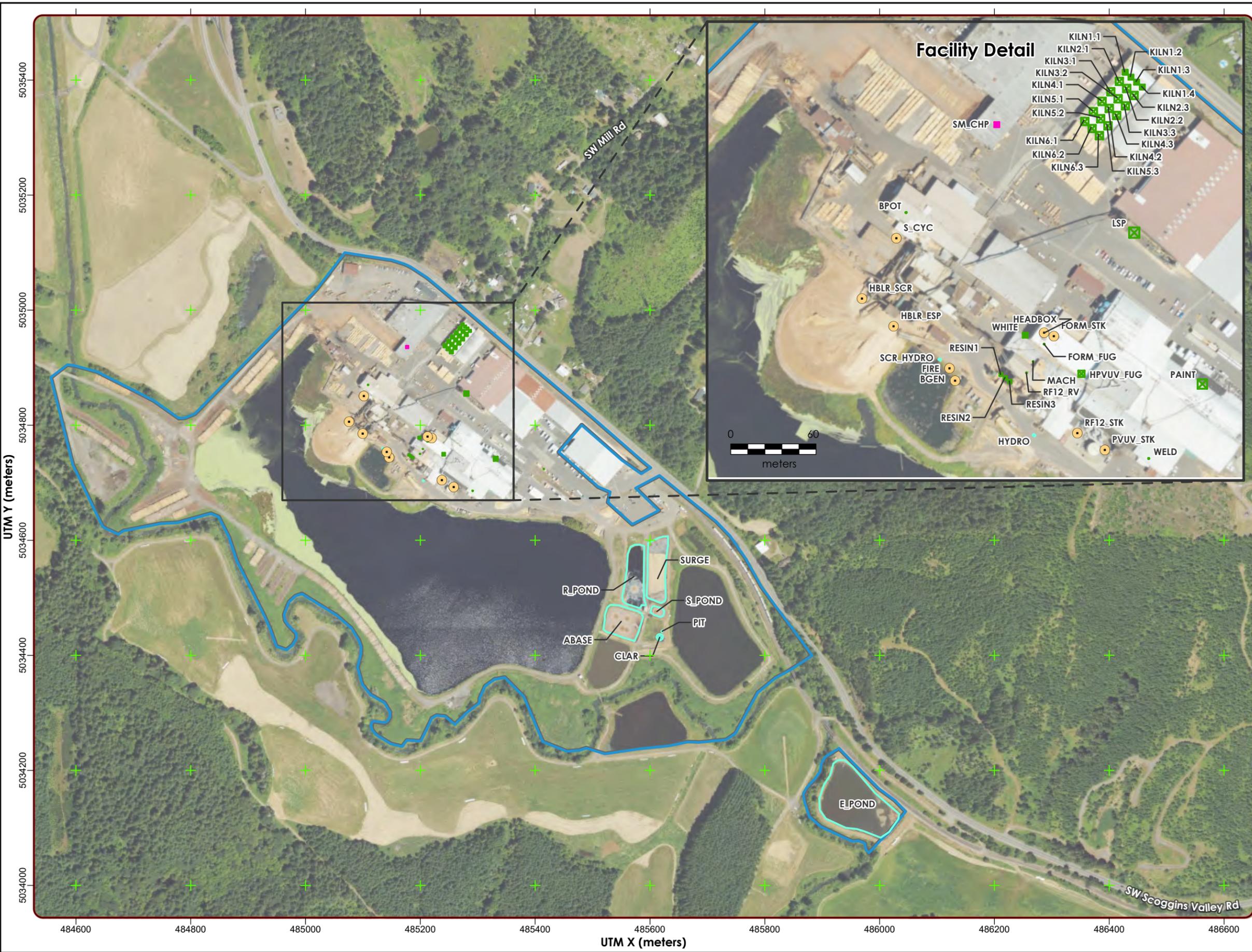
### Key Map



**Note**  
mph = miles per hour.



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**Figure 5-2**  
**TEU Source Locations**

Stimson Lumber Company  
Forest Grove Complex  
Gaston, OR

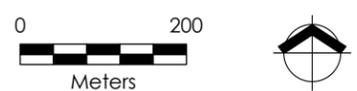
**Legend**

- Proposed Volume Source
- Existing Volume Source
- Existing Area Source
- Existing Point Source
- Exposure Assessment Boundary
- + UTM 50-Meter Grid Mark

**Key Map**



**Notes**  
TEU = toxics emission unit.  
UTM = universal transverse mercator projection.



**Data Source**  
Aerial photography from the U.S. Department of Agriculture



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Project: MD066.03.011 Produced By: sturner Reviewed By: aragiers Print Date: 3/25/2025 Path: X:\0666.03 Stimson Timber\011\Pro\MD066.03\_011\_004.aprx Fig 4-3 PM2.5 Modeling Source Locations

### Figure 5-3 Proposed PM<sub>2.5</sub> Modeling Source Locations

Stimson Lumber Company  
Forest Grove Complex  
Gaston, OR

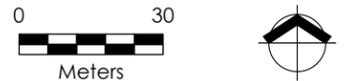
#### Legend

-  Proposed Point Source
-  Proposed Volume Source
-  Exposure Assessment Boundary
-  UTM 50-Meter Grid Mark

#### Key Map



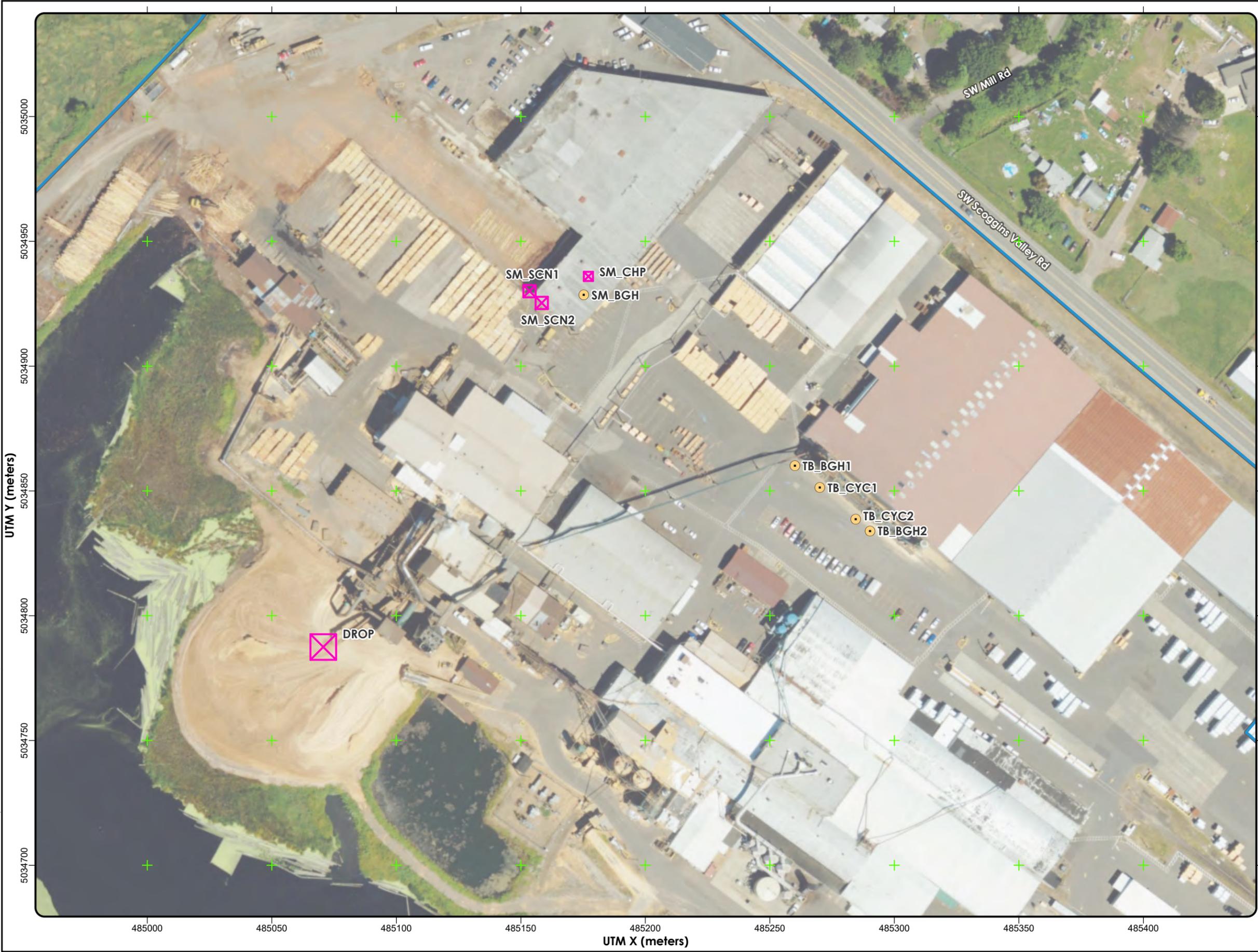
**Notes**  
 PM<sub>2.5</sub> = particulate matter with an aerodynamic diameter of less than or equal to 2.5 microns.  
 UTM = universal transverse mercator projection.



**Data Source**  
 Aerial photography from the U.S. Department of Agriculture



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UTM Y (meters)

UTM X (meters)

Project: MD066.03.011 Produced By: sturner Reviewed By: aragors Print Date: 3/25/2025 Path: X:\0066.03 Stimson Timber\011\Pro\M0066\_03\_011\_004.aprx Fig 4-4 Proposed Downwash Structure Locations



### Figure 5-4 Proposed Downwash Structure Locations

Stimson Lumber Company  
Forest Grove Complex  
Gaston, OR

#### Legend

-  Proposed Downwash Structure
-  Existing Downwash Structure
-  Exposure Assessment Boundary
-  UTM 50-Meter Grid Mark

#### Key Map



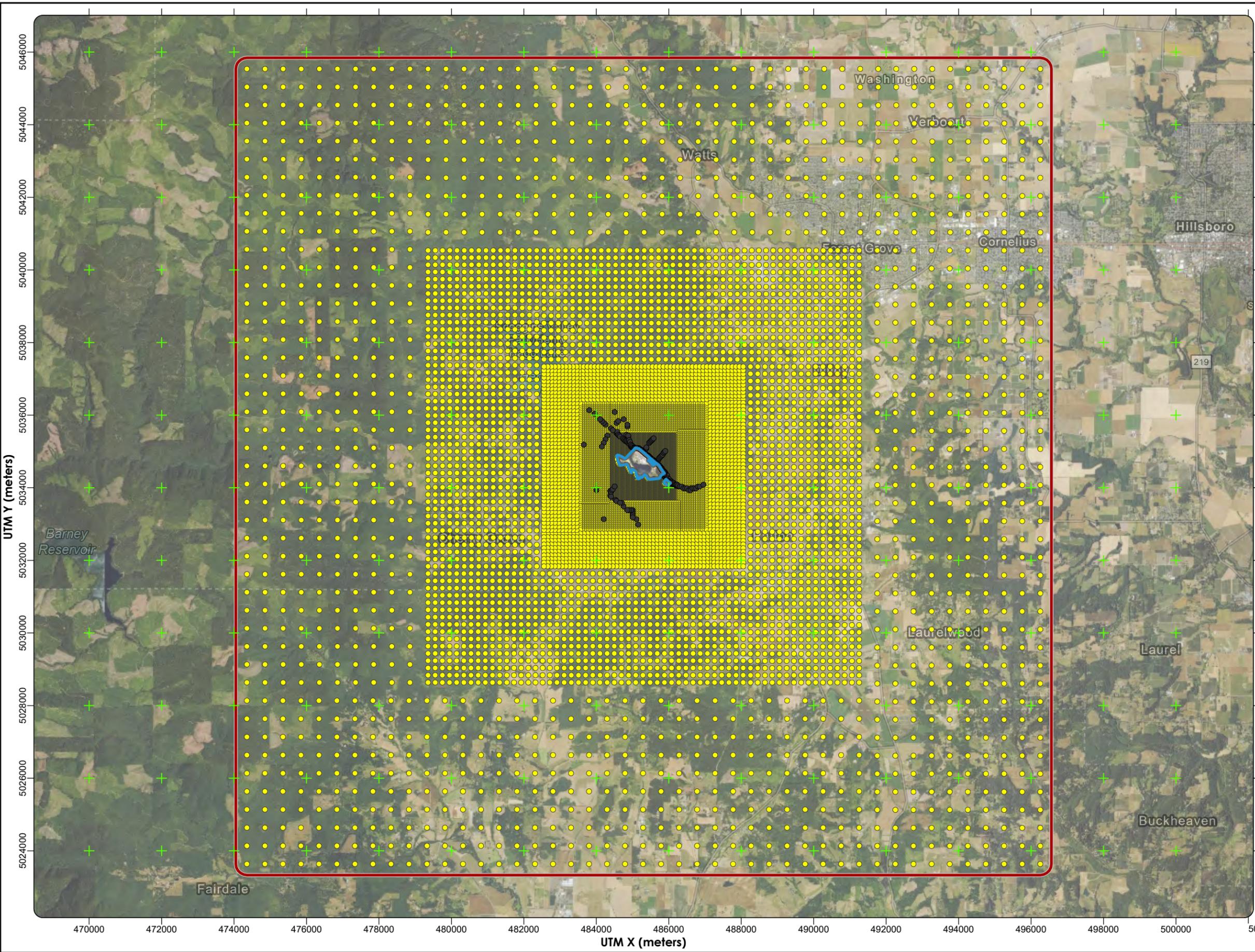
**Note**  
UTM = universal transverse mercator projection.



**Data Sources**  
Aerial photography from the U.S. Department of Agriculture; reference labels from Esri.

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### Figure 5-5 Proposed Receptor Locations

Stimson Lumber Company  
Forest Grove Complex  
Gaston, OR

#### Legend

- Proposed Receptor
- Proposed Receptor in Right-of-Way (CAO Only)
- ▭ Proposed Modeling Domain Extent
- ▭ Exposure Assessment Boundary
- + UTM 2-Kilometer Grid Mark

#### Key Map



**Notes**  
For PM<sub>2.5</sub> 24-hour NAAQS modeling, all receptors were considered.  
CAO = Cleaner Air Oregon.  
PM 2.5 = fine particulate matter.  
NAAQS = national ambient air quality standards.  
UTM = universal transverse mercator projection.



**Data Sources**  
Aerial photography from the U.S. Department of Agriculture; reference labels from Esri.



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Project: M0066.03.011 Produced By: sturner Reviewed By: aragors Print Date: 3/25/2025 Path: X:\0666.03.stimson\Timber\011\Pro\M0066.03\_011\_004.aprx Fig 4-4 Proposed Receptor Locations in Immediate Area

### Figure 5-6 Proposed Receptor Locations in Immediate Area

Stimson Lumber Company  
Forest Grove Complex  
Gaston, OR

#### Legend

- Proposed Receptor
- Proposed Receptor in Right-of-Way (CAO Only)
- Exposure Assessment Boundary
- + UTM 200-Meter Grid Mark

#### Key Map



#### Notes

For PM<sub>2.5</sub> 24-hour NAAQS modeling, all receptors were considered.  
 CAO = Cleaner Air Oregon.  
 PM<sub>2.5</sub> = fine particulate matter.  
 NAAQS = national ambient air quality standards.  
 UTM = universal transverse mercator projection.



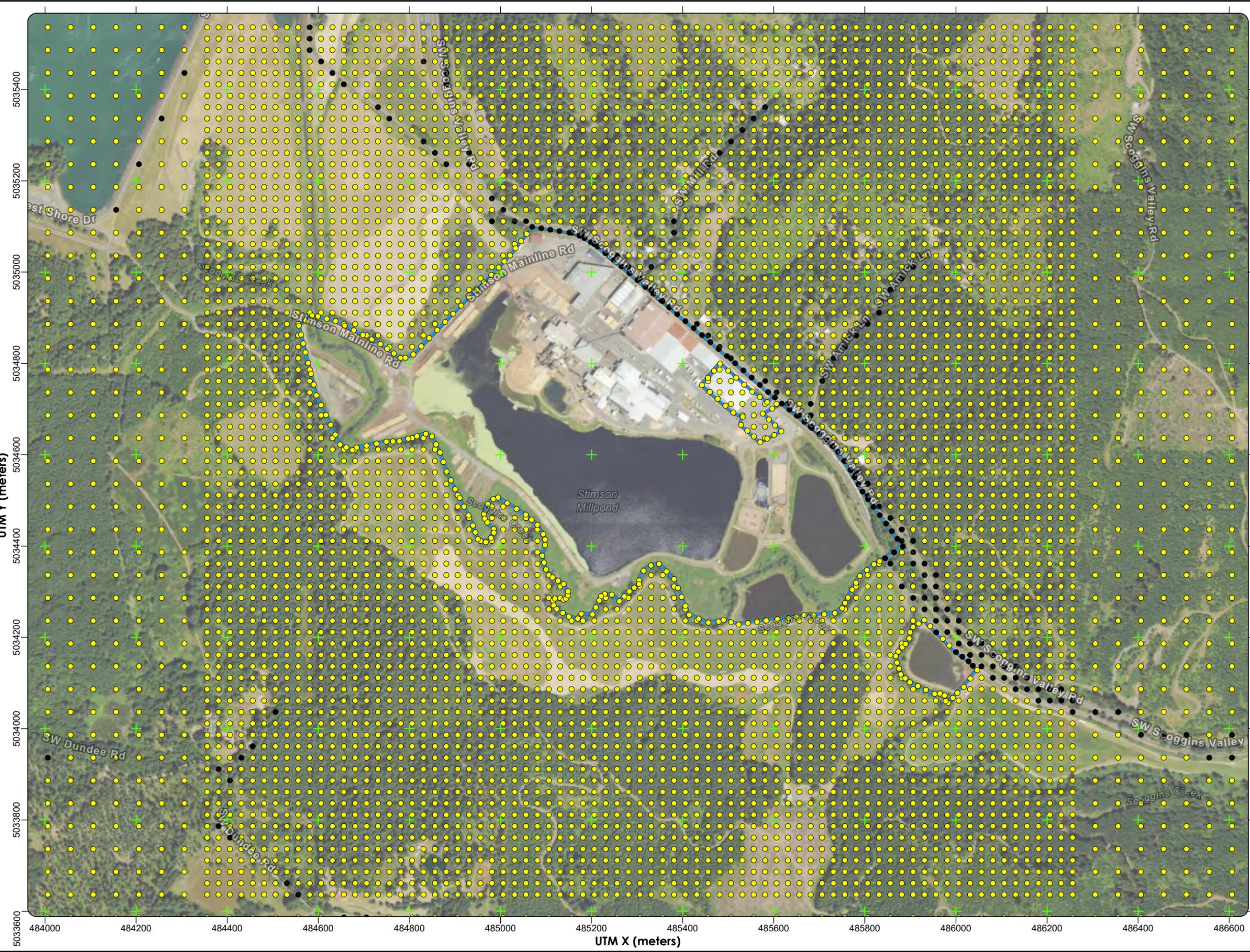
#### Data Sources

Aerial photography from the U.S. Department of Agriculture; reference labels from Esri.



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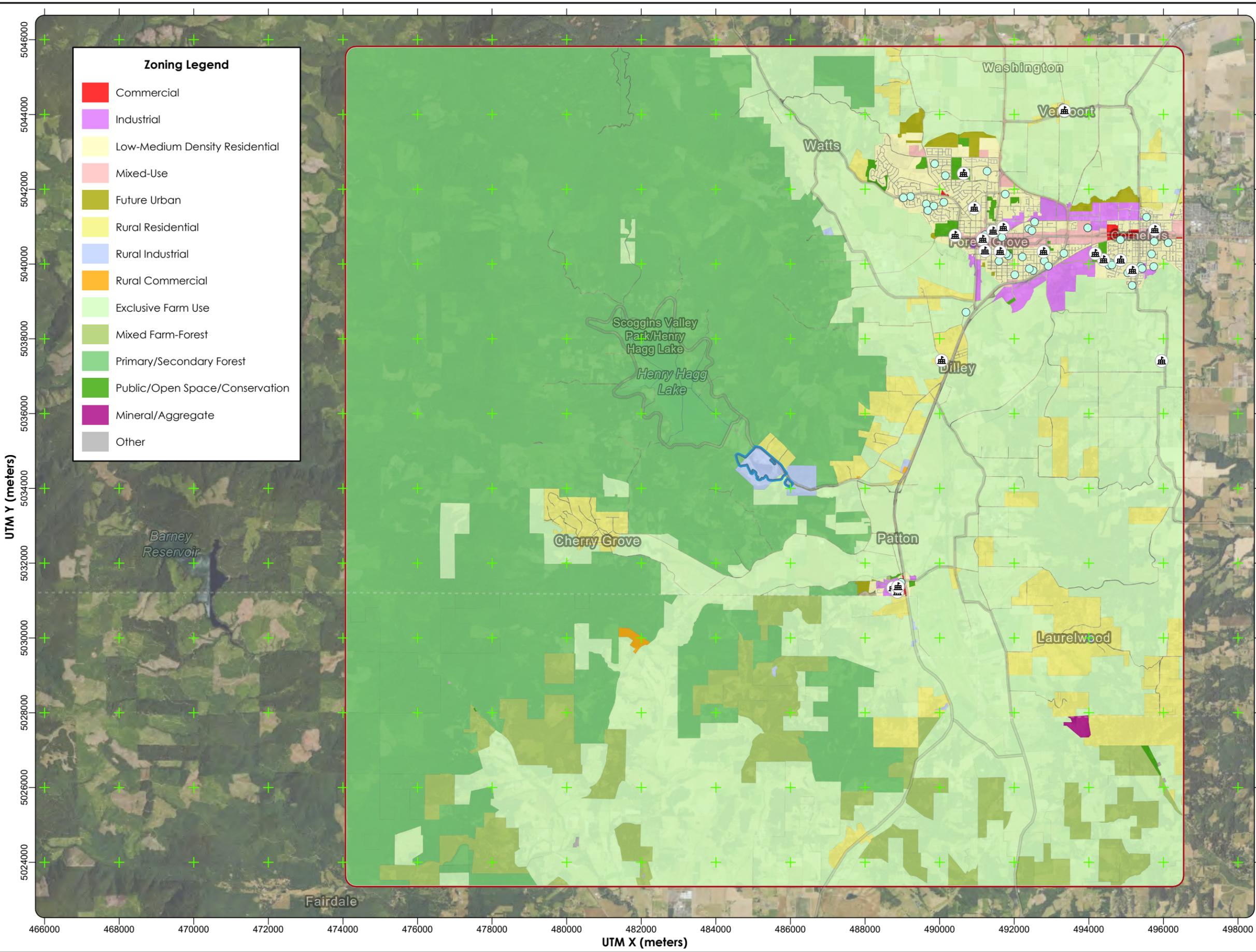
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UTM Y (meters)

UTM X (meters)

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Path: X:\0066.03\Stimson Timber\011\Proj\M0066\_03\_011\_004.aprx\Fig\_4.7\_Existing\_Land\_Use\_Classification



### Zoning Legend

- Commercial
- Industrial
- Low-Medium Density Residential
- Mixed-Use
- Future Urban
- Rural Residential
- Rural Industrial
- Rural Commercial
- Exclusive Farm Use
- Mixed Farm-Forest
- Primary/Secondary Forest
- Public/Open Space/Conservation
- Mineral/Aggregate
- Other

## Figure 7-1 Existing Land Use Zoning Classifications

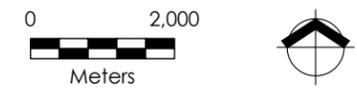
Stimson Lumber Company  
Forest Grove Complex  
Gaston, OR

### Legend

- School Location (2015-16)
- Early Learning Providers (2020)
- Exposure Assessment Boundary
- Proposed Modeling Domain Extent
- UTM 2-Kilometer Grid Mark



**Note**  
UTM = universal transverse mercator projection.



**Data Sources**  
Zoning from the Oregon Department of Land Conservation and Development (2023); school locations from Oregon Health Authority; early learning providers from Oregon Department of Education; aerial photography from the U.S. Department of Agriculture; reference labels from Esri.

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# Figure 7-2 Existing Land Use Zoning Classifications in the Immediate Area

Stimson Lumber Company  
Forest Grove Complex  
Gaston, OR

### Legend

-  Exposure Assessment Boundary
-  Tax Lot
-  UTM 200-Meter Grid Mark

### Zoning

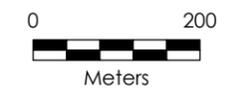
-  Rural Residential
-  Rural Industrial
-  Exclusive Farm Use
-  Primary/Secondary Forest

### Key Map



### Note

UTM = universal transverse mercator projection.



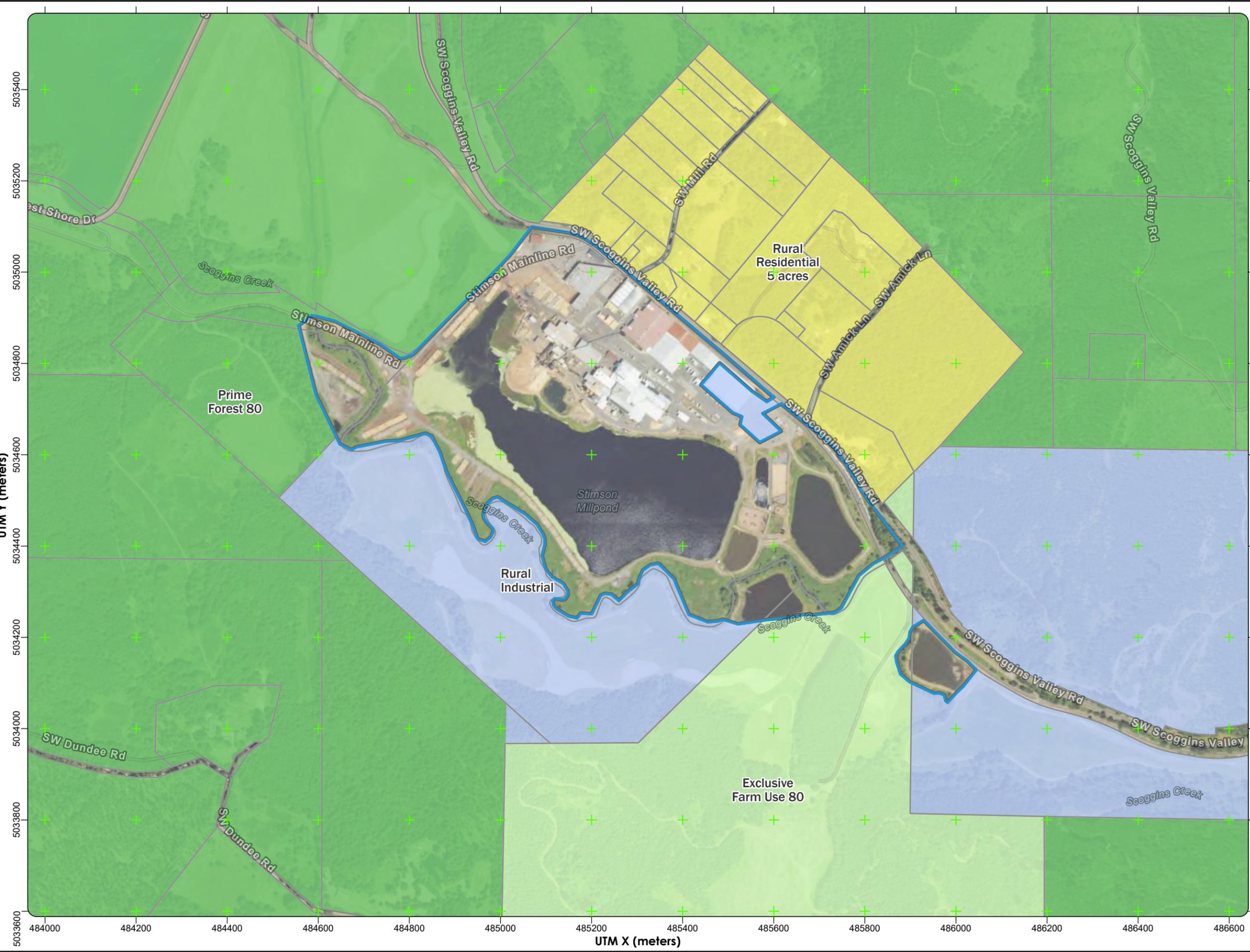
### Data Sources

Zoning from the Oregon Department of Land Conservation and Development (2023); aerial photography from the U.S. Department of Agriculture; tax lots from Oregon Metro and Yamhill County.



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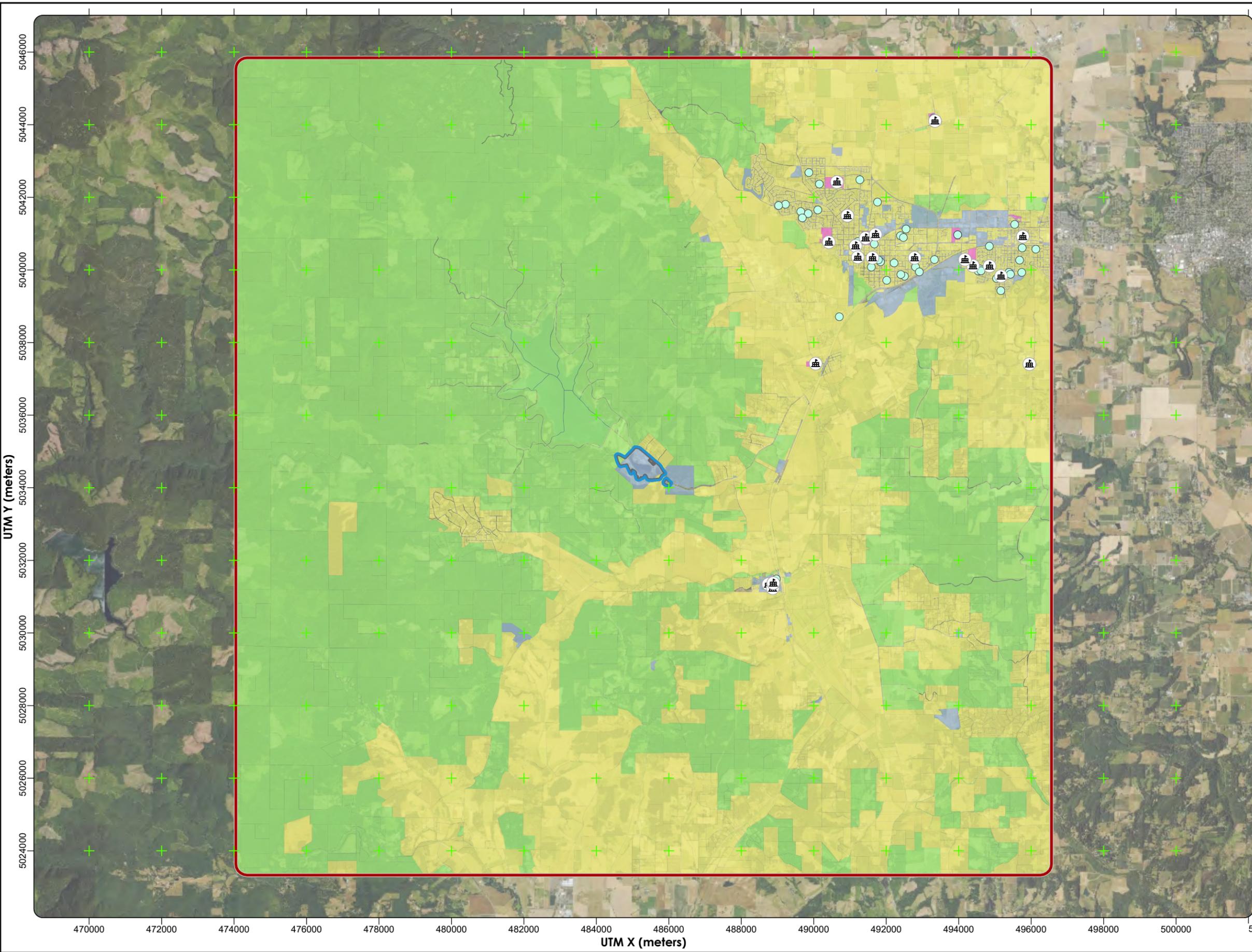
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UTM Y (meters)

UTM X (meters)

Project: MD066.03.011 Produced By: sturner Reviewed By: aragors Print Date: 3/25/2025 Path: X:\0066.03 Stimson Timber\011\Pro\_MD066.03\_01\_004.aprx\Fig 4.9 Proposed Exposure Categorization



### Figure 7-3 Proposed Exposure Categorization

Stimson Lumber Company  
Forest Grove Complex  
Gaston, OR

#### Legend

- School Location (2015-16)
- Early Learning Providers (2020)
- Exposure Assessment Boundary
- Proposed Modeling Domain Extent
- UTM 2-Kilometer Grid Mark

#### Proposed Exposure Classification

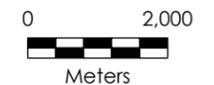
- Acute Only
- Child
- Residential
- Worker

#### Key Map



**Notes**  
Existing land use classifications revised to reflect the risk-based concentration categories presented in Oregon Administrative Rule 340-245-8040 Table 4.

Tax lot land use is used for classifications where zoning data are unavailable and where tax lot land use is more conservative. UTM = universal transverse mercator projection.



**Data Sources**  
Aerial photography from the U.S. Department of Agriculture; schools from Oregon Health Authority; early learning facilities from the Oregon Department of Education.



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Path: X:\0066.03\Stimson Timber\011\Pro\M0066\_03\_011\_004.aprx\Fig 4-10 Proposed Exposure Categorization in Immediate Area  
Print Date: 3/25/2025  
Reviewed By: aragors  
Produced By: sturner  
Project: M0066.03.011

# Figure 7-4 Proposed Exposure Categorization in the Immediate Area

Stimson Lumber Company  
Forest Grove Complex  
Gaston, OR

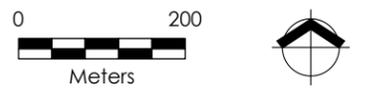
### Legend

-  Exposure Assessment Boundary
-  UTM 200-Meter Grid Mark
- Proposed Exposure Classification**
-  Acute Only
-  Residential
-  Worker

### Key Map



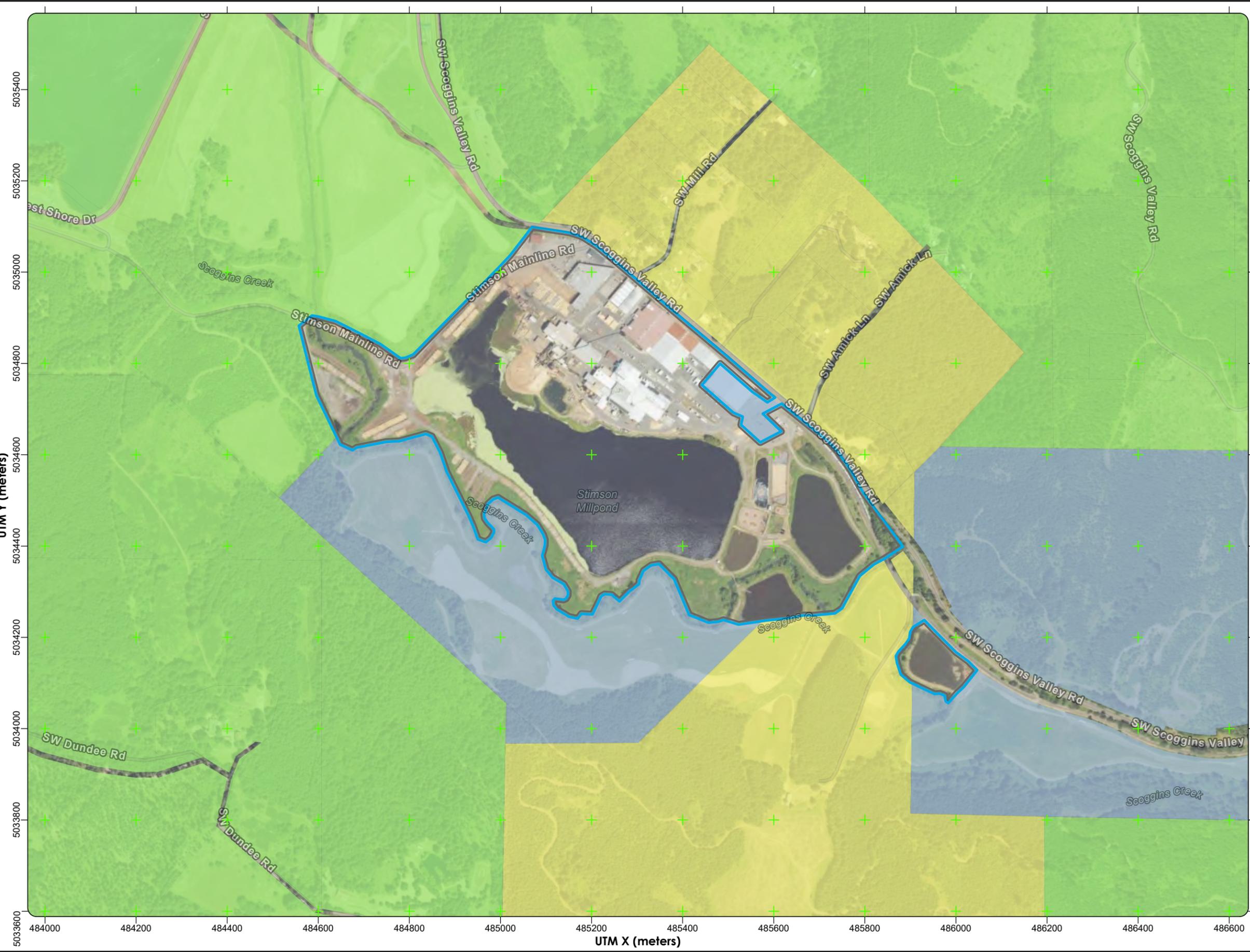
**Notes**  
Existing land use classifications revised to reflect the risk-based concentration categories presented in Oregon Administrative Rule 340-245-8040 Table 4.  
Tax lot land use is used for classifications where zoning data is unavailable and where tax lot land use is more conservative.  
UTM = universal transverse mercator projection.



**Data Sources**  
Aerial photography from the U.S. Department of Agriculture.



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# Tables

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**Table 4-1  
Proposed AAQS Model Emission Rates and Level 3 RA Model Release Parameters  
Stimson Lumber Company Forest Grove Complex—Gaston, Oregon**

Point Sources														
Model ID	Model Source Description	Model Assessment? (Yes/No)		UTM Coordinates <sup>(1)</sup>		Stack Orientation <sup>(1)</sup>	Base Elevation <sup>(2)</sup> (m)	Release Height <sup>(1)</sup> (m)	Stack Diameter <sup>(1)</sup> (m)	Exit Velocity <sup>(1)</sup> (m/s)	Exit Flowrate <sup>(a)</sup> (m <sup>3</sup> /s)	Exit Temperature <sup>(1)</sup> (K)	PM <sub>2.5</sub> Model Emission Rate	
		Level 3 RA	PM <sub>2.5</sub> 24-hr	Eastings	Northing								(lb/day)	(g/s) <sup>(b)</sup>
HBLR_SCR	Comingled boiler and fuel dryer exhaust scrubber stack	Yes	No	485,074.8	5,034,806.4	Vertical	67.1	12.8	1.52	11.03	20.11	322.0	--	--
HBLR_ESP	Comingled boiler exhaust ESP stack	Yes	No	485,098.6	5,034,785.7	Vertical	66.2	18.3	2.29	12.24	50.25	506.9	--	--
RF12_STK	Scrubber 5 controlling refiners	Yes	No	485,236.5	5,034,705.5	Vertical	65.2	13.7	0.76	4.11	1.87	323.7	--	--
PVUV_STK	Press vent exhaust stack	Yes	No	485,257.1	5,034,693.1	Vertical	66.2	13.7	2.74	6.42	37.95	313.7	--	--
FORM_STK	Forming Line Exhaust Vent	Yes	No	485,218.9	5,034,778.2	Horizontal	65.8	15.4	0.20	14.84	0.49	337.0	--	--
HEADBOX	Headbox Vent	Yes	No	485,211.5	5,034,780.6	Vertical	65.6	14.9	0.69	8.36	3.11	Ambient	--	--
S_CYC	Green chipper cyclone	Yes	No	485,100.7	5,034,851.7	Vertical	64.7	6.7	0.30	15.24	1.11	Ambient	--	--
FIRE	Emergency Fire Pump	Yes	No	485,140.6	5,034,754.1	Vertical	64.9	1.8	0.08	47.71	0.22	449.8	--	--
BGEN	Emergency Diesel Generator	Yes	No	485,144.8	5,034,745.0	Vertical	64.6	2.1	0.08	47.71	0.22	449.8	--	--
EGEN01	Proposed diesel emergency generator	Yes	No	485,145.0	5,034,796.6	Vertical	64.8	1.9	0.13	50.38	0.64	806.2	--	--
SM_BGH	Proposed 95-20 Hew Saw Baghouse	No	Yes	485,175.3	5,034,928.5	Vertical	66.2	6.1	1.27	16.76	21.27	Ambient	2.76 <sup>(3)</sup>	0.014
TB_BGH1	Proposed Truck Bin Baghouse 1	No	Yes	485,260.1	5,034,860.0	Horizontal	66.9	13.7	0.52	15.24	3.18	Ambient	0.32 <sup>(3)</sup>	1.70E-03
TB_BGH2	Proposed Truck Bin Baghouse 2	No	Yes	485,290.2	5,034,833.9	Horizontal	66.9	13.7	0.52	15.24	3.18	Ambient	0.32 <sup>(3)</sup>	1.70E-03
TB_CYC1	Proposed Truck Bin Cyclone 1	No	Yes	485,270.1	5,034,851.3	Vertical	66.9	23.3	1.37	5.08	7.51	Ambient	5.46 <sup>(3)</sup>	0.029
TB_CYC2	Proposed Truck Bin Cyclone 2	No	Yes	485,284.5	5,034,838.7	Vertical	66.9	22.4	1.37	5.08	7.51	Ambient	5.46 <sup>(3)</sup>	0.029

Discrete Volume Sources													
Model ID	Model Source Description	Model Assessment? (Yes/No)		UTM Coordinates <sup>(1)</sup>		On or Adjacent to a Building?	Base Elevation <sup>(2)</sup> (m)	Release Height (m)	Length of Side (m)	Initial Lateral Dimension <sup>(c)</sup> (m)	Initial Vertical Dimension (m)	PM <sub>2.5</sub> Model Emission Rate	
		Level 3 RA	PM <sub>2.5</sub>	Eastings	Northing							(lb/day)	(g/s) <sup>(b)</sup>
KILN1_1	Kiln 1 (1 of 4)	Yes	No	485,272.4	5,034,975.8	Yes	67.4	10.69 <sup>(5)</sup>	3.66	0.85	9.94 <sup>(5)</sup>	--	--
KILN1_2	Kiln 1 (2 of 4)	Yes	No	485,276.7	5,034,972.2	Yes	67.5	10.69 <sup>(5)</sup>	3.66	0.85	9.94 <sup>(5)</sup>	--	--
KILN1_3	Kiln 1 (3 of 4)	Yes	No	485,280.9	5,034,968.4	Yes	67.5	10.69 <sup>(5)</sup>	3.66	0.85	9.94 <sup>(5)</sup>	--	--
KILN1_4	Kiln 1 (4 of 4)	Yes	No	485,285.2	5,034,964.7	Yes	67.5	10.69 <sup>(5)</sup>	3.66	0.85	9.94 <sup>(5)</sup>	--	--
KILN2_1	Kiln 2 (1 of 3)	Yes	No	485,268.0	5,034,969.0	Yes	67.4	12.91 <sup>(5)</sup>	5.49	1.28	12.01 <sup>(5)</sup>	--	--
KILN2_2	Kiln 2 (3 of 3)	Yes	No	485,273.5	5,034,963.7	Yes	67.5	12.91 <sup>(5)</sup>	5.49	1.28	12.01 <sup>(5)</sup>	--	--
KILN2_3	Kiln 2 (2 of 3)	Yes	No	485,279.0	5,034,958.5	Yes	67.5	12.91 <sup>(5)</sup>	5.49	1.28	12.01 <sup>(5)</sup>	--	--
KILN3_1	Kiln 3 (1 of 3)	Yes	No	485,261.5	5,034,961.3	Yes	67.5	12.91 <sup>(5)</sup>	5.49	1.28	12.01 <sup>(5)</sup>	--	--
KILN3_2	Kiln 3 (3 of 3)	Yes	No	485,267.0	5,034,956.0	Yes	67.4	12.91 <sup>(5)</sup>	5.49	1.28	12.01 <sup>(5)</sup>	--	--
KILN3_3	Kiln 3 (2 of 3)	Yes	No	485,272.5	5,034,950.7	Yes	67.4	12.91 <sup>(5)</sup>	5.49	1.28	12.01 <sup>(5)</sup>	--	--
KILN4_1	Kiln 4 (1 of 3)	Yes	No	485,255.0	5,034,954.0	Yes	67.4	12.91 <sup>(5)</sup>	5.49	1.28	12.01 <sup>(5)</sup>	--	--
KILN4_2	Kiln 4 (3 of 3)	Yes	No	485,260.4	5,034,948.8	Yes	67.3	12.91 <sup>(5)</sup>	5.49	1.28	12.01 <sup>(5)</sup>	--	--
KILN4_3	Kiln 4 (2 of 3)	Yes	No	485,265.9	5,034,943.5	Yes	67.4	12.91 <sup>(5)</sup>	5.49	1.28	12.01 <sup>(5)</sup>	--	--
KILN5_1	Kiln 5 (1 of 3)	Yes	No	485,248.4	5,034,946.4	Yes	67.4	12.91 <sup>(5)</sup>	5.49	1.28	12.01 <sup>(5)</sup>	--	--
KILN5_2	Kiln 5 (3 of 3)	Yes	No	485,253.9	5,034,941.1	Yes	67.5	12.91 <sup>(5)</sup>	5.49	1.28	12.01 <sup>(5)</sup>	--	--
KILN5_3	Kiln 5 (2 of 3)	Yes	No	485,259.4	5,034,935.8	Yes	67.5	12.91 <sup>(5)</sup>	5.49	1.28	12.01 <sup>(5)</sup>	--	--
KILN6_1	Kiln 6 (1 of 3)	Yes	No	485,242.0	5,034,939.0	Yes	67.4	12.91 <sup>(5)</sup>	5.49	1.28	12.01 <sup>(5)</sup>	--	--
KILN6_2	Kiln 6 (3 of 3)	Yes	No	485,247.5	5,034,933.7	Yes	67.5	12.91 <sup>(5)</sup>	5.49	1.28	12.01 <sup>(5)</sup>	--	--
KILN6_3	Kiln 6 (2 of 3)	Yes	No	485,253.0	5,034,928.4	Yes	67.6	12.91 <sup>(5)</sup>	5.49	1.28	12.01 <sup>(5)</sup>	--	--
WHITE	Whitewater Chest (open bay door)	Yes	No	485,197.3	5,034,778.9	Yes	65.5	7.47 <sup>(8)</sup>	3.66	0.85	6.95 <sup>(d)</sup>	--	--
MACH	Machine Chest Vent	Yes	No	485,203.3	5,034,759.3	Yes	65.6	4.42 <sup>(8)</sup>	0.30	0.07	4.11 <sup>(d)</sup>	--	--
RF12_RV	Refiner - Rotary Valve Stack	Yes	No	485,198.3	5,034,750.7	Yes	65.5	7.47 <sup>(8)</sup>	0.30	0.07	6.95 <sup>(d)</sup>	--	--
HPVUV_FUG	Press fugitive emissions release	Yes	No	485,239.5	5,034,750.1	Yes	65.8	9.45 <sup>(8)</sup>	4.70	1.09	8.79 <sup>(d)</sup>	--	--
FORM_FUG	Forming line fugitive emissions release	Yes	No	485,211.5	5,034,772.3	Yes	65.7	4.42 <sup>(8)</sup>	0.46	0.11	4.11 <sup>(d)</sup>	--	--
GAS	Gas Storage Tank	Yes	No	485,414.0	5,034,724.5	No	65.4	2.44 <sup>(11)</sup>	0.30	0.07	0.57 <sup>(e)</sup>	--	--
RESIN1	Resin Tank 1	Yes	No	485,179.0	5,034,749.5	Yes	65.2	7.47 <sup>(8)</sup>	0.91	0.21	6.95 <sup>(d)</sup>	--	--
RESIN2	Resin Tank 2	Yes	No	485,182.3	5,034,746.9	Yes	65.4	7.47 <sup>(8)</sup>	0.91	0.21	6.95 <sup>(d)</sup>	--	--
RESIN3	Resin Tank 3	Yes	No	485,185.8	5,034,744.3	Yes	65.8	7.47 <sup>(8)</sup>	0.91	0.21	6.95 <sup>(d)</sup>	--	--
PAINT	Paintline Top & Bottom Coat	Yes	No	485,330.2	5,034,742.4	Yes	65.7	4.66 <sup>(8)</sup>	7.05	1.64	4.22 <sup>(d)</sup>	--	--
WELD	Welding Emissions	Yes	No	485,289.9	5,034,686.7	Yes	65.7	4.04 <sup>(8)</sup>	0.61	0.14	3.76 <sup>(d)</sup>	--	--
BPOT	Vent above babbitt pots	Yes	No	485,107.9	5,034,870.9	Yes	64.9	7.16 <sup>(8)</sup>	0.61	0.14	6.66 <sup>(d)</sup>	--	--
SM_DROP	Proposed Sawmill Residuals Drop	No	Yes	485,070.7	5,034,787.5	No	69.4	4.57 <sup>(8)</sup>	10.3	2.39	1.06 <sup>(e)</sup>	0.072 <sup>(3)</sup>	3.78E-04
SM_SCN1	Proposed Screen 1	No	Yes	485,153.5	5,034,930.0	No	66.2	4.57 <sup>(8)</sup>	4.91	1.14	4.25 <sup>(d)</sup>	1.16 <sup>(3)</sup>	6.07E-03
SM_SCN2	Proposed Screen 2	No	Yes	485,158.4	5,034,925.3	No	66.2	4.57 <sup>(8)</sup>	4.9	1.14	4.25 <sup>(d)</sup>	1.16 <sup>(3)</sup>	6.07E-03
SM_CHP	Proposed Overs Chipper	Yes	Yes	485,177.1	5,034,936.0	No	66.2	4.57 <sup>(8)</sup>	3.7	0.85	4.25 <sup>(d)</sup>	0.17 <sup>(3)</sup>	9.07E-04

Area Sources												
Model ID	Model Source Description	Model Assessment? (Yes/No)		UTM Coordinates <sup>(1)</sup>		Area Source Geometry	Base Elevation <sup>(2)</sup> (m)	Source Area <sup>(4)</sup> (m <sup>2</sup> )	Source Diameter (m)	On or Adjacent to a Building?	Release Height AGL <sup>(7)</sup> (m)	Number of Vertices
		Level 3 RA	PM <sub>2.5</sub>	Eastings	Northing							
SCR_HYDRO	Exposed area above boiler scrubber hydrosieve	Yes	No	485,132.2	5,034,760.8	Area	65.0	2.20 <sup>(7)</sup>	--	No	0	4 <sup>(6)</sup>
HYDRO	Exposed area above hydrosieves	Yes	No	485,202.9	5,034,704.2	Area	65.3	2.20 <sup>(7)</sup>	--	No	0	4 <sup>(6)</sup>
CLAR	WWTP-Secondary clarifier	Yes	No	485,616.0	5,034,432.2	Circular	61.7	89.4	5.33	No	0	-- <sup>(9)</sup>
PIT	WWTP-Sludge pit opening	Yes	No	485,620.2	5,034,442.6	Circular	61.3	3.60	1.07	No	0	-- <sup>(9)</sup>
S_POND	WWTP-Sludge pond	Yes	No	485,599.9	5,034,475.4	Polygon	63.2	317 <sup>(7)</sup>	--	No	0	9 <sup>(6)</sup>
R_POND	WWTP-Reuse pond	Yes	No	485,588.9	5,034,590.6	Polygon	62.7	3,340 <sup>(7)</sup>	--	No	0	15 <sup>(6)</sup>
SURGE	WWTP-Surge pond	Yes	No	485,630.3	5,034,606.2	Polygon	62.8	3,496 <sup>(7)</sup>	--	No	0	16 <sup>(6)</sup>
ABASE	WWTP-Aeration basin	Yes	No	485,571.8	5,034,425.4	Polygon	63.1	3,099 <sup>(7)</sup>	--	No	0	14 <sup>(6)</sup>
E_POND	WWTP-East pond	Yes	No	485,893.9	5,034,151.6	Polygon	62.1	10,784 <sup>(7)</sup>	--	No	0	18 <sup>(6)</sup>

**Notes**

K = kelvin; m = meter; m/s = meters per second; m<sup>3</sup>/s = cubic meters per second; UTM = Universal Transverse Mercator; AGL = above ground level.

<sup>(a)</sup> Exit flowrate (m<sup>3</sup>/s) = (π/4) x (stack diameter [m])<sup>2</sup> x (exit velocity [m/s])

<sup>(b)</sup> Emission rate (g/s) = (daily emissions estimate [lb/day]) x (453.592 g/lb) / (24 hrs/day) / (3,600 s/hr)

<sup>(c)</sup> Initial lateral dimension (m) = (length of side [m]) / (4.3) (4)

<sup>(d)</sup> Initial vertical dimension (m) = (building height [m]) / (2.15) (4)

<sup>(e)</sup> Initial vertical dimension (m) = (vertical dimension [m]) / (4.3) (4)

**References**

<sup>(1)</sup> Value based on information provided by Stimson Lumber Company.

<sup>(2)</sup> Base elevation derived from the US Geological Survey National Elevation Dataset downloaded and processed in AERMET.

<sup>(3)</sup> See Attachment A of the Construction ACDP application.

<sup>(4)</sup> See "User's Guide for the AMS/EPA Regulatory Model (AERMOD)" dated November 2024.

<sup>(5)</sup> Release height and initial vertical dimension were adjusted for thermal buoyancy using methods from Appendix 12, sub Appendix 1, Plume-Rise Methodology for Slag Pits Based Upon Work by John Irwin (EPA; 2003). See Table 4-5, Kiln Thermal Buoyancy Effects Calculations.

<sup>(6)</sup> Area of source and number of vertices identified in AERMOD View software.

<sup>(7)</sup> Source is not a circular area source type. Therefore, there's no diameter.

<sup>(8)</sup> See "Users Guide for the AMS/EPA Regulatory Model (AERMOD)," EPA-454/B-18-001 dated April 2018. Assumes release height for elevated volume source is half of the building height.

<sup>(9)</sup> Circular area source type, therefore, there are no vertices.

Table 4-2  
Proposed Annual TAC Emission Rates  
Slimson Lumber Company Forest Grove Complex—Gaston, Oregon

Toxic Air Contaminant	CAS or DEQ ID	RBC? (Yes/No)	Annual Emission Estimates																																
			Hogged Fuel-Fired Boiler (ESP Control)		Hogged Fuel-Fired Boiler (Scrubber Control)		Fuel Dryer		Total Scrubber		Kilns Total		Kiln 1 <sup>(1)</sup>		Kilns 2-6 <sup>(1)</sup>		Lumber Surface Protection		Existing Stud Mill Cyclone (S-182)		Proposed Sawmill Cyclone		Resin Storage Tank 1		Resin Storage Tank 2		Resin Storage Tank 3		Resin Storage Tank 4		HBWW - Whitewater Chest		Bay Door		
			(lb/yr) <sup>(2)</sup>	(g/s) <sup>(3)</sup>	(lb/yr) <sup>(2)</sup>	(g/s) <sup>(3)</sup>	(lb/yr) <sup>(2)</sup>	(g/s) <sup>(3)</sup>	(lb/yr) <sup>(2)</sup>	(g/s) <sup>(3)</sup>	(lb/yr) <sup>(2)</sup>	(g/s) <sup>(3)</sup>	(lb/yr) <sup>(2)</sup>	(g/s) <sup>(3)</sup>	(lb/yr) <sup>(2)</sup>	(g/s) <sup>(3)</sup>	(lb/yr) <sup>(2)</sup>	(g/s) <sup>(3)</sup>	(lb/yr) <sup>(2)</sup>	(g/s) <sup>(3)</sup>	(lb/yr) <sup>(2)</sup>	(g/s) <sup>(3)</sup>	(lb/yr) <sup>(2)</sup>	(g/s) <sup>(3)</sup>	(lb/yr) <sup>(2)</sup>	(g/s) <sup>(3)</sup>	(lb/yr) <sup>(2)</sup>	(g/s) <sup>(3)</sup>	(lb/yr) <sup>(2)</sup>	(g/s) <sup>(3)</sup>	(lb/yr) <sup>(2)</sup>	(g/s) <sup>(3)</sup>			
			HBLR ESP		HBLR SCR		KILN1.1 - 1.4		KILN2.1 - 6.3		LSP		S_CYC		SM_CHP		RESIN1		RESIN2		RESIN3		RESIN4		WHITE		WHITE								
Antimony and compounds	7440-36-0	Yes	0.39	5.6E-06	0.16	2.2E-06	--	--	0.16	2.2E-06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Arsenic and compounds	7440-38-2	Yes	2.42	3.5E-05	0.87	1.2E-05	--	--	0.87	1.2E-05	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--		
Barium and compounds	7440-39-3	No	268	3.9E-03	31.0	4.5E-04	--	--	31.0	4.5E-04	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Beryllium and compounds	7440-41-7	Yes	0.037	5.3E-07	5.4E-03	7.8E-08	--	--	5.4E-03	7.8E-08	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Cadmium and compounds	7440-43-9	Yes	0.42	6.0E-06	0.25	3.6E-06	--	--	0.25	3.6E-06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Chromium VI	18540-29-9	Yes	0.35	5.0E-06	0.018	2.6E-07	--	--	0.018	2.6E-07	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Cobalt and compounds	7440-48-4	Yes	0.64	9.2E-06	0.15	2.2E-06	--	--	0.15	2.2E-06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Aluminum and compounds	7429-90-5	No	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Zinc oxide	1314-13-2	No	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Copper and compounds	7440-50-8	Yes	4.86	7.0E-05	1.42	2.0E-05	--	--	1.42	2.0E-05	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Lead and compounds	7439-92-1	Yes	6.48	9.6E-05	2.35	3.4E-05	--	--	2.35	3.4E-05	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Phosphorus and compounds	504	No	397	5.7E-03	24.2	3.5E-04	--	--	24.2	3.5E-04	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Manganese and compounds	7439-96-5	Yes	1.23	1.8E-05	19.5	2.8E-04	--	--	19.5	2.8E-04	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Mercury and compounds	7439-97-6	Yes	1.23	1.8E-05	0.10	1.5E-06	--	--	0.10	1.5E-06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Molybdenum trioxide	1313-27-5	No	3.98	5.7E-05	0.24	3.5E-06	--	--	0.24	3.5E-06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Nickel and compounds	7440020m	Yes	3.59	5.2E-05	0.57	8.3E-06	--	--	0.57	8.3E-06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Selenium and compounds	7782-49-2	Yes	2.08	3.0E-05	0.13	1.9E-06	--	--	0.13	1.9E-06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Silver and compounds	7440-22-4	No	1.26	1.8E-05	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Thallium and compounds	7440-28-0	No	--	--	0.14	2.1E-06	--	--	0.14	2.1E-06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Vanadium (fume or dust)	7440-42-2	Yes	0.76	1.1E-05	0.046	6.7E-07	--	--	0.046	6.7E-07	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Zinc and compounds	7440-66-6	No	73.8	1.1E-03	18.2	2.6E-04	--	--	18.2	2.6E-04	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Acetaldehyde	75-07-0	Yes	343	5.2E-03	22.1	3.2E-04	73.7	1.1E-03	95.8	1.4E-03	15,411	0.22	350	5.0E-03	934	0.013	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Acetone	67-64-1	Yes	678	9.8E-03	41.4	5.9E-04	400	5.8E-03	441	6.3E-03	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Acetophenone	98-86-2	No	2.36	3.4E-05	0.14	2.1E-06	0.36	5.2E-06	0.50	7.3E-06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Acrolein	107-02-8	Yes	333	4.8E-03	20.3	2.9E-04	125	1.8E-03	145	2.1E-03	277	4.0E-03	6.29	9.0E-05	16.8	2.4E-04	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Ammonia	7664-41-7	Yes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Benzene	71-43-2	Yes	1.256	0.018	76.6	1.1E-03	31.1	4.5E-04	108	1.5E-03	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Carbon tetrachloride	56-23-5	Yes	12.6	1.8E-04	0.77	1.1E-05	--	--	0.77	1.1E-05	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Chlorine	7782-50-5	Yes	1.012	0.015	61.8	8.9E-04	--	--	61.8	8.9E-04	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Butyl benzyl phthalate	85-68-7	No	34.3	4.9E-04	2.10	3.0E-05	--	--	2.10	3.0E-05	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Ethylene glycol monobutyl ether	1113-26-2	Yes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Epichlorohydrin	106-89-8	Yes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Dipropylene glycol monomethyl ether	34990-94-8	No	--	--	--	--	--	--	--	--	--	--	--	--	--	--	2.472	0.036	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Vinyl acetate	108-05-4	Yes	--	--	--	--	0.33	4.8E-06	0.33	4.8E-06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Chlorobenzene	108-90-7	Yes	21.3	3.1E-04	1.30	1.9E-05	--	--	1.30	1.9E-05	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Chloroform	67-66-3	Yes	25.8	3.7E-04	1.57	2.3E-05	--	--	1.57	2.3E-05	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Crotonaldehyde	4170-30-3	No	57.4	8.3E-04	3.50	5.0E-05	43.4	6.2E-04	46.9	6.7E-04	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Diethyl phthalate	84-74-2	No	42.7	6.1E-04	2.60	3.7E-05	--	--	2.60	3.7E-05	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1,2-Dichloropropane (Propylene dichloride)	78-87-5	Yes	21.5	3.1E-04	1.31	1.9E-05	--	--	1.31	1.9E-05	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Diethylphthalate	84-66-2	No	55.9	8.0E-04	3.41	4.9E-05	--	--	3.41	4.9E-05	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Ethyl benzene	100-41-4	Yes	15.6	2.2E-04	0.95	1.4E-05	--	--	0.95	1.4E-05	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Formaldehyde	50-00-0	Yes	1,346	0.019	82.1	1.2E-03	38.7	5.6E-04	121	1.7E-03	705	0.010	16.0	2.3E-04	42.7	6.1E-04	--	--	--	--	--	7.95	1.1E-04	6.82	9.8E-05	8.29	1.2E-04	--	--	16.1	2.3E-04	16.1	2.3E-04		



Table 4-2  
Proposed Annual TAC Emission Rates (Cont.)  
Stimson Lumber Company Forest Grove Complex—Gaston, Oregon

Toxic Air Contaminant	CAS or DEQ ID	RBC? (Yes/No)	Annual Emission Estimates																					
			Existing TEUs with No Change																					
			WW - Reuse Pond		Basecoat		Topcoat		Paintline Total		Welding		Babbitt Pot		Fire Pump		Backup Generator		Proposed Emergency Generator		Gas Storage Tank		Facility Total	
			(lb/yr) <sup>(3)</sup>	(g/s) <sup>(4)</sup>	(lb/yr) <sup>(3)</sup>	(g/s) <sup>(4)</sup>	(lb/yr) <sup>(3)</sup>	(g/s) <sup>(4)</sup>	(lb/yr) <sup>(3)</sup>	(g/s) <sup>(4)</sup>	(lb/yr) <sup>(3)</sup>	(g/s) <sup>(4)</sup>	(lb/yr) <sup>(3)</sup>	(g/s) <sup>(4)</sup>	(lb/yr) <sup>(3)</sup>	(g/s) <sup>(4)</sup>	(lb/yr) <sup>(3)</sup>	(g/s) <sup>(4)</sup>	(lb/yr) <sup>(3)</sup>	(g/s) <sup>(4)</sup>	(lb/yr) <sup>(3)</sup>	(g/s) <sup>(4)</sup>	(lb/yr)	(g/s)
<b>Model ID</b>	--	--	<b>E_POND</b>		<b>PAINT</b>		<b>WELD</b>		<b>BPOT</b>		<b>FIRE</b>		<b>BGEN</b>		<b>EGEN01</b>		<b>GAS</b>		<b>Facility Total</b>		--	--		
Antimony and compounds	7440-36-0	Yes	--	--	--	--	--	--	0.023	3.2E-07	2.3E-04	3.3E-09	1.3E-03	1.9E-08	4.7E-04	6.8E-09	--	--	--	--	0.57	8.2E-06		
Arsenic and compounds	7440-38-2	Yes	--	--	--	--	--	--	--	--	1.2E-03	1.7E-08	6.5E-03	9.4E-08	2.4E-03	3.4E-08	--	--	--	--	3.30	4.7E-05		
Barium and compounds	7440-39-3	No	--	--	--	--	--	--	--	--	2.7E-04	3.9E-09	1.5E-03	2.2E-08	5.6E-04	8.0E-09	--	--	--	--	299	4.3E-03		
Beryllium and compounds	7440-41-7	Yes	--	--	--	--	--	--	--	--	3.4E-06	4.9E-11	1.9E-05	2.8E-10	7.1E-06	1.0E-10	--	--	--	--	0.042	6.0E-07		
Cadmium and compounds	7440-43-9	Yes	--	--	--	--	--	--	--	--	1.1E-03	1.6E-08	6.1E-03	8.8E-08	2.2E-03	3.2E-08	--	--	--	--	0.67	9.7E-06		
Chromium VI	18540-27-9	Yes	--	--	--	--	--	2.1E-03	3.1E-08	--	7.2E-05	1.0E-09	4.1E-04	5.9E-09	1.5E-04	2.1E-09	--	--	--	--	0.37	5.3E-06		
Cobalt and compounds	7440-48-4	Yes	--	--	--	--	--	2.6E-04	3.7E-09	--	1.1E-05	1.6E-10	6.4E-05	9.3E-10	2.3E-05	3.4E-10	--	--	--	--	0.79	1.1E-05		
Aluminum and compounds	7429-90-5	Yes	--	--	--	--	--	1.52	2.2E-05	--	--	--	--	--	--	--	--	--	--	--	1.52	2.2E-05		
Zinc oxide	1314-13-2	No	--	--	--	--	--	7.1E-03	1.0E-07	--	--	--	--	--	--	--	--	--	--	--	7.1E-03	1.0E-07		
Copper and compounds	7440-50-8	Yes	--	--	--	--	--	1.6E-03	2.2E-08	0.023	3.2E-07	3.0E-03	4.2E-08	0.017	2.4E-07	6.1E-03	8.8E-08	--	--	--	--	6.33	9.1E-05	
Lead and compounds	7439-92-1	Yes	--	--	--	--	--	--	--	--	6.0E-03	8.6E-08	0.034	4.9E-07	0.012	1.8E-07	--	--	--	--	9.07	1.3E-04		
Phosphorus and compounds	504	No	--	--	--	--	--	--	--	--	6.1E-03	8.7E-08	0.034	4.9E-07	0.013	1.8E-07	--	--	--	--	422	6.1E-03		
Manganese and compounds	7439-96-5	Yes	--	--	--	--	--	0.29	4.1E-06	--	2.2E-03	3.2E-08	0.013	1.8E-07	4.6E-03	6.6E-08	--	--	--	--	1.42	2.0E-03		
Mercury and compounds	7439-97-6	Yes	--	--	--	--	--	--	--	--	1.4E-03	2.1E-08	8.2E-03	1.2E-07	3.0E-03	4.3E-08	--	--	--	--	1.34	1.9E-05		
Molybdenum trioxide	1313-27-5	No	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	4.22	6.1E-05		
Nickel and compounds	7440200n	Yes	--	--	--	--	--	0.013	1.9E-07	2.3E-03	3.2E-08	2.8E-03	4.0E-08	0.016	2.3E-07	5.8E-03	8.4E-08	--	--	--	--	4.20	6.0E-05	
Selenium and compounds	7782-49-2	Yes	--	--	--	--	--	--	--	--	1.6E-03	2.3E-08	9.0E-03	1.3E-07	3.3E-03	4.7E-08	--	--	--	--	2.22	3.2E-05		
Silver and compounds	7440-22-4	No	--	--	--	--	--	--	--	--	3.5E-05	5.0E-10	2.0E-04	2.8E-09	7.2E-05	1.0E-09	--	--	--	--	1.26	1.8E-05		
Thallium and compounds	7440-29-0	No	--	--	--	--	--	--	--	--	1.7E-04	2.5E-09	9.8E-04	1.4E-08	3.6E-04	5.1E-09	--	--	--	--	0.81	1.2E-05		
Vanadium (fume or dust)	7440-42-2	Yes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	0.81	1.2E-05		
Zinc and compounds	7440-46-6	No	--	--	--	--	--	--	--	--	3.8E-03	5.4E-08	0.021	3.1E-07	7.8E-03	1.1E-07	--	--	--	--	92.1	1.3E-03		
Acetaldehyde	75-07-0	Yes	0.017	2.4E-07	--	--	--	--	--	--	0.56	8.1E-04	3.20	4.6E-05	1.17	1.7E-05	--	--	--	--	18.237	0.26		
Acetone	67-64-1	Yes	6.3E-06	9.1E-11	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	2.066	0.030		
Acetophenone	98-86-2	No	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	2.86	4.1E-05		
Acrolein	107-02-8	Yes	9.7E-19	1.4E-23	--	--	--	--	--	--	0.024	3.5E-07	0.14	2.0E-06	0.051	7.3E-07	--	--	--	--	926	0.013		
Ammonia	7664-41-7	Yes	--	--	--	--	--	--	--	--	2.09	3.0E-05	11.8	1.7E-04	4.32	6.2E-05	--	--	--	--	18.3	2.6E-04		
Benzene	71-43-2	Yes	--	--	--	--	--	--	--	--	0.13	1.9E-06	0.76	1.1E-05	0.28	4.0E-06	3.62	5.2E-05	--	--	1.368	0.020		
Carbon tetrachloride	56-23-5	Yes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	13.4	1.9E-04		
Chlorine	7782-50-5	Yes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.074	0.015		
Butyl benzyl phthalate	85-69-7	No	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	36.4	5.2E-04		
Ethylene glycol monobutyl ether	111-76-2	Yes	--	--	66.0	9.5E-04	33.4	4.8E-04	99.4	1.4E-03	--	--	--	--	--	--	--	--	--	--	99.4	1.4E-03		
Epichlorohydrin	106-89-8	Yes	--	--	66.0	9.5E-04	33.4	4.8E-04	99.4	1.4E-03	--	--	--	--	--	--	--	--	--	--	99.4	1.4E-03		
Dipropylene glycol monomethyl ether	34590-94-8	No	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	2.472	0.036		
Vinyl acetate	108-05-4	Yes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	0.33	4.8E-06		
Chlorobenzene	108-90-7	Yes	--	--	--	--	--	--	--	--	1.4E-04	2.1E-09	8.2E-04	1.2E-08	3.0E-04	4.3E-09	--	--	--	--	22.6	3.2E-04		
Chloroform	67-66-3	Yes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	27.3	3.9E-04		
Crotonaldehyde	4170-30-3	No	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	104	1.5E-03		
Dibutyl phthalate	84-74-2	No	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	45.3	6.5E-04		
1,2-Dichloropropane (Propylene dichloride)	78-87-5	Yes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	22.8	3.3E-04		
Diethylphthalate	84-66-2	No	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	59.3	8.5E-04		
Ethyl benzene	100-41-4	Yes	--	--	--	--	--	--	--	--	7.9E-03	1.1E-07	0.045	6.4E-07	0.016	2.3E-07	0.16	2.3E-06	--	--	16.8	2.4E-04		
Formaldehyde	50-00-0	Yes	6.0E-03	8.6E-08	--	--	--	--	--	--	1.24	1.8E-05	7.05	1.0E-04	2.57	3.7E-05	--	--	--	--	3.016	0.043		
Methyl isobutyl ketone (MIBK, Hexone)	108-10-1	Yes	8.1E-05	1.2E-09	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	818	0.012		
Isopropylbenzene (Cumene)	98-82-8	Yes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	8.4E-03	1.2E-07	--	--	24.5	3.5E-04		
Hexane	110-54-3	Yes	--	--	--	--	--	--	--	--	0.019	2.8E-07	0.11	1.6E-06	0.040	5.8E-07	--	--	--	--	392	5.4E-03		
Isopropyl alcohol	67-63-0	Yes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	6.145	0.088		
Methanol	67-56-1	Yes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	41.376	0.60		
1,3,5-Trimethylbenzene	108-67-8	Yes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	0.049	7.1E-07	--	--	0.049	7.1E-07		
Fluorides	FLUORIDES	Yes	--	--	--	--	--	0.24	3.4E-06	--	--	--	--	--	--	--	--	--	--	--	0.24	3.4E-06		
1,2,3-Trimethylbenzene	526-73-8	Yes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	0.029	4.2E-07	--	--	0.029	4.2E-07		
Cyclohexane	110-82-7	Yes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	6.00	8.6E-05	--	--	6.00	8.6E-05		
Bromomethane (Methyl bromide)	74-83-9	Yes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	15.9	2.3E-04		
Chloromethane (Methyl chloride)	74-87-3	Yes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	61.3	8.8E-04		
1,3-Butadiene	106-99-0	Yes	--	--	--	--	--	--	--	--	0.16	2.3E-06	0.89	1.3E-05	0.32	4.7E-06	--	--	--	--	1.37	2.0E-05		
1,1,1-Trichloroethane (Methyl chloroform)	71-55-6	Yes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	78.6	1.1E-03		
1,2,4-Trimethyl benzene	95-43-6	Yes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	0.11	1.6E-06	--	--	0.87	1.3E-05		
Dichloromethane (Methylene chloride)	75-09-2	Yes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	55.1	7.9E-03		
2-Butanone (Methyl ethyl ketone)	78-93-3	Yes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	65.9	9.5E-04		
Phenol	108-95-2	Yes	3.7E-12	5.4E-17	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	461	6.6E-03		
Propylene	115-07-1</																							







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Table 4-4  
Proposed Acute Risk Equivalent Emission Rates  
Slimson Lumber Company Forest Grove Complex—Gaston, Oregon

Toxic Air Contaminant	CAS or DEQ ID	Acute Risk Based Concentration (Yes/No)	Acute Risk Based Concentration (1)	Proposed Project													Existing TEU's with No Change							
				Acute Risk Equivalent Emission Rate (g/s per ug/m <sup>3</sup> )																				
				Hogged Fuel-Fired Boiler (ESP Control)	Total Scrubber	Kiln 1 (2)	Kilns 2-4 (3)	Lumber Surface Protection	Existing Shud Mill Cyclone (S-182)	Proposed Sawmill Cyclone	Resin Storage Tank 1	Resin Storage Tank 2	Resin Storage Tank 3	HBWW - Whitewater Chest	Press (Stock)	Press (Fugitive)	Refiner (Rotary Valve)	Refiner (Scrubber 5)	Forming Line (Stock)	Forming Line (Fugitive)	HBWW - Machine Chest	HBWW - Head box		
Model ID	--	--	--	HLR ESP	HLR SCR	KILN1 - 1-1.4	KILN2 - 4.3	LSP	S_CYC	SM_CHP	RESIN1	RESIN2	RESIN3	WHITE	PVUV_STK	HPVUV_FUG	RF12_RV	RF12_STK	FORM_STK	FORM_FUG	MACH	HEADBOX		
Antimony and compounds	7440-36-0	Yes	1.00	5.1E-06	1.1E-05	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Arsenic and compounds	7440-38-2	Yes	0.20	1.6E-04	3.1E-04	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Barium and compounds	7440-39-3	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Beryllium and compounds	7440-41-7	Yes	0.020	2.4E-05	1.9E-05	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Cadmium and compounds	7440-43-7	Yes	0.030	1.8E-04	5.9E-04	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Chromium VI	18540-29-9	Yes	0.30	1.3E-05	4.3E-06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Cobalt and compounds	7440-48-4	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Aluminum and compounds	7429-90-5	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Zinc oxide	1314-13-2	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Copper and compounds	7440-50-8	Yes	100.0	6.4E-07	1.0E-06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Lead and compounds	7439-92-1	Yes	0.15	5.8E-04	1.1E-03	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Phosphorus and compounds	7723-14-0	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Manganese and compounds	7439-96-5	Yes	0.30	5.4E-03	4.6E-03	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Mercury and compounds	7439-97-6	Yes	0.60	2.7E-05	1.2E-05	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Molybdenum trioxide	1313-27-5	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Nickel and compounds	7440-020	Yes	0.20	2.4E-04	2.0E-04	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Selenium and compounds	7782-49-2	Yes	2.00	1.4E-05	4.7E-06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Silver and compounds	7440-22-4	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Thallium and compounds	7440-28-0	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Vanadium (fume or dust)	7440-62-2	Yes	0.80	1.2E-05	4.1E-06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Zinc and compounds	7440-66-6	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Acetaldehyde	75-07-0	Yes	470	1.0E-05	9.9E-06	3.0E-05	8.0E-05	--	--	--	--	--	--	4.9E-07	2.1E-05	1.3E-06	2.6E-06	5.7E-05	1.5E-05	1.5E-06	7.6E-06	2.2E-06		
Acetone	67-64-1	Yes	62,000	1.4E-07	3.2E-07	--	--	--	--	--	--	--	--	1.4E-09	1.9E-07	3.3E-09	6.5E-08	5.2E-08	5.0E-08	5.0E-09	1.9E-08	4.3E-09		
Acetophenone	98-86-2	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Acrolin	107-02-8	Yes	4.90	6.3E-04	9.7E-04	3.3E-05	8.7E-05	--	--	--	--	--	--	2.4E-25	--	--	--	4.2E-04	8.6E-05	8.6E-06	6.2E-05	1.5E-24		
Ammonia	7664-41-7	Yes	1,200	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Benzene	71-43-2	Yes	29.0	5.7E-04	2.3E-04	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Carbon tetrachloride	56-23-5	Yes	1,900	8.7E-08	2.9E-08	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Chlorine	7782-50-5	Yes	170	7.8E-05	2.6E-05	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Butyl benzyl phthalate	85-89-7	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Ethylene glycol monobutyl ether	111-76-2	Yes	29,000	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Dipropylene glycol monomethyl ether	34590-94-8	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Vinyl acetate	108-05-4	Yes	200	--	7.0E-08	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Epichlorohydrin	106-89-8	Yes	1,300	--	--	--	--	--	--	--	--	--	--	1.1E-10	--	--	--	--	--	--	--	--	--	
Chlorobenzene	108-90-7	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Chloroform	67-66-3	Yes	490	6.9E-07	2.3E-07	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Chloroacetaldehyde	4170-30-3	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Diethyl phthalate	84-74-2	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
1,2-Dichloropropane (Propylene dichloride)	78-87-5	Yes	230	1.2E-06	4.0E-07	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Diethylphthalate	84-66-2	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Ethyl benzene	100-41-4	Yes	22,000	9.3E-09	3.1E-09	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Formaldehyde	50-00-0	Yes	49.0	3.6E-04	1.5E-04	1.9E-05	5.0E-05	--	--	1.9E-05	1.9E-05	1.9E-05	4.7E-06	2.1E-04	1.1E-05	7.0E-06	6.9E-05	5.7E-05	5.7E-06	5.7E-06	1.7E-05	3.9E-06		
Methyl isobutyl ketone (MIBK, Hexone)	108-10-1	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Isopropylbenzene (Cumene)	98-82-8	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Hexane	110-54-3	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Isopropyl alcohol	67-63-0	Yes	3,200	2.4E-05	7.8E-06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Methanol	67-56-1	Yes	28,000	4.4E-07	1.6E-07	1.0E-06	2.7E-06	--	6.9E-08	4.2E-08	3.3E-08	3.3E-08	3.3E-08	--	1.6E-05	3.2E-07	4.3E-08	1.1E-07	5.7E-07	5.7E-08	--	--		
1,3,5-trimethylbenzene	108-57-8	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Fluorides	FLUORIDES	Yes	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
1,2,3-trimethylbenzene	526-73-8	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Cyclohexane	110-82-7	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Bromomethane (Methyl bromide)	74-83-9	Yes	3,900	4.9E-08	2.2E-08	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Chloromethane (Methyl chloride)	74-87-3	Yes	1,000	7.3E-07	3.3E-07	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
1,3-Butadiene	106-99-0	Yes	460	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
1,1,1-Trichloroethane (Methyl chloroform)	71-55-4	Yes	11,000	8.8E-08	2.9E-08	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
1,2,4-trimethyl benzene	95-63-6	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Dichloromethane (Methylene chloride)	75-09-2	Yes	2,100	3.2E-06	1.2E-06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
2-Butanone (Methyl ethyl ketone)	78-93-3	Yes	5,000	2.3E-08	2.1E-07	--	--	--	--	--	--	--	--	--	--	--	4.8E-08	2.7E-08	8.7E-08	8.7E-09	--	--	--	
Phenol	108-95-2	Yes	5,800	4.6E-07	1.8E-06	--	--	--	--	--	1.9E-10	1.9E-10	1.9E-10	6.2E-10	--	6.4E-08	--	--	--	--	--	7.9E-10	3.7E-10	
Propylene	115-10-7	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Propionaldehyde	123-38-4	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
Styrene	100-42-5	Yes	21,000	3.8E-07	1.3E-07	--	--	--	--	--	--	--	--	--	--	--	--	8.3E-09	8.3E-09	--	--	--	--	
Toluene	108-88-3	Yes	7,500	2.6E-08	2.9E-07	--	--	--	--	--	--	--	--	--	--	5.4E-09	--	--	5.8E-08	5.8E-09	--	--	--	
Xylene (mixture)	1330-20-7	Yes	8,700	1.0E																				

**Table 4.4  
Proposed Acute Risk Equivalent Emission Rates (Cont.)  
Stimson Lumber Company Forest Grove Complex—Gaston, Oregon**

Toxic Air Contaminant	CAS or DEQ ID	Acute Risk-Based Concentration (Yes/No)	Acute Risk-Based Concentration (ug/m <sup>3</sup> ) <sup>(1)</sup>	Acute Risk Equivalent Emission Rate <sup>(2)</sup> (g/s per ug/m <sup>3</sup> ) Existing TEU's with No Change																
				WW - Hydrosieves	BLR-SCR - Hydrosieves	WW - Surge Pond	WW - Aeration Basin	WW - Secondary Clarifier	WW - Sludge PII Conveyor	WW - Sludge Pond	WW - Reuse Pond	WW - Reuse Pond	Paintline Total	Welding	Boblift Pot	Fire Pump	Backup Generator	Proposed Emergency Generator	Gas Storage Tank	
				HYDRO	SCR_HYDRO	SURGE	ABASE	CLAR	PIT	S_POND	R_POND	E_POND	PAINT	WELD	BPOI	FIRE	EGEN	EGEN01	GAS	
<b>Model ID</b>	--	--	--	HYDRO	SCR_HYDRO	SURGE	ABASE	CLAR	PIT	S_POND	R_POND	E_POND	PAINT	WELD	BPOI	FIRE	EGEN	EGEN01	GAS	
Antimony and compounds	7440-36-0	Yes	1.00	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Arsenic and compounds	7440-38-2	Yes	0.20	--	--	--	--	--	--	--	--	--	--	--	--	6.1E-07	3.4E-06	1.5E-05	--	--
Barium and compounds	7440-39-3	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Beryllium and compounds	7440-41-7	Yes	0.020	--	--	--	--	--	--	--	--	--	--	--	--	1.8E-08	1.0E-07	4.5E-07	--	--
Cadmium and compounds	7440-43-9	Yes	0.020	--	--	--	--	--	--	--	--	--	--	--	--	3.8E-06	2.1E-05	9.4E-05	--	--
Chromium VI	18540-29-0	Yes	0.20	--	--	--	--	--	--	--	--	--	--	2.4E-05	--	2.5E-08	1.4E-07	6.3E-07	--	--
Cobalt and compounds	7440-48-4	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Aluminum and compounds	7429-90-5	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Zinc oxide	1314-13-2	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Copper and compounds	7440-50-8	Yes	100.0	--	--	--	--	--	--	--	--	--	--	1.3E-08	3.5E-08	3.1E-09	1.8E-08	7.7E-08	--	--
Lead and compounds	7439-92-1	Yes	0.15	--	--	--	--	--	--	--	--	--	--	--	--	4.2E-06	2.4E-05	1.0E-04	--	--
Phosphorus and compounds	7723-14-0	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Manganese and compounds	7439-96-5	Yes	0.30	--	--	--	--	--	--	--	--	--	--	5.2E-05	--	7.8E-07	4.4E-06	1.9E-05	--	--
Mercury and compounds	7439-97-6	Yes	0.60	--	--	--	--	--	--	--	--	--	--	--	--	2.5E-07	1.4E-06	6.3E-06	--	--
Molybdenum trioxide	1313-27-5	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Nickel and compounds	7440200n	Yes	0.20	--	--	--	--	--	--	--	--	--	--	3.0E-04	1.8E-06	1.5E-06	8.4E-06	3.7E-05	--	--
Selenium and compounds	7782-49-2	Yes	2.00	--	--	--	--	--	--	--	--	--	--	--	--	8.3E-08	4.7E-07	2.1E-06	--	--
Silver and compounds	7440-22-4	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Thallium and compounds	7440-28-0	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Vanadium (fume or dust)	7440-62-2	Yes	0.80	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Zinc and compounds	7440-66-6	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Acetaldehyde	75-07-0	Yes	470	3.4E-06	3.3E-08	6.2E-06	2.4E-07	4.1E-09	1.0E-11	7.2E-10	3.8E-10	5.2E-10	--	--	--	1.3E-07	7.1E-07	3.1E-06	--	--
Acetone	67-64-1	Yes	62,000	3.1E-09	6.3E-10	1.8E-09	9.0E-12	1.8E-13	5.4E-29	6.9E-15	1.3E-15	1.5E-15	--	--	--	--	--	--	--	--
Acetophenone	98-86-2	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Acrolein	107-02-8	Yes	6.90	2.3E-24	1.5E-05	1.9E-24	5.3E-26	7.5E-28	1.2E-25	4.1E-24	1.4E-24	2.0E-24	--	--	--	3.7E-07	2.1E-06	9.2E-06	--	--
Ammonia	7664-41-7	Yes	1,200	--	--	--	--	--	--	--	--	--	--	--	--	1.8E-07	1.0E-06	4.5E-06	--	--
Benzene	71-43-2	Yes	29.0	--	--	--	--	--	--	--	--	--	--	--	--	4.9E-07	2.8E-06	1.2E-05	3.4E-05	--
Carbon tetrachloride	56-23-5	Yes	1,900	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Chlorine	7782-50-5	Yes	170	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Bulky benzyl phthalate	85-88-7	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Ethylene glycol monobutyl ether	111-76-2	Yes	29,000	--	--	--	--	--	--	--	--	--	1.4E-07	--	--	--	--	--	--	--
Dipropylene glycol monomethyl ether	34590-94-8	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Vinyl acetate	108-05-4	Yes	200	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Epichlorohydrin	106-89-8	Yes	1,300	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Chlorobenzene	108-90-7	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Chloroform	67-66-3	Yes	490	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Crotonaldehyde	4170-30-3	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Diethyl phthalate	84-74-2	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1,2-Dichloropropane (Propylene dichloride)	78-87-5	Yes	230	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Diethylphthalate	84-66-2	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Ethyl benzene	100-41-4	Yes	22,000	--	--	--	--	--	--	--	--	--	--	--	--	3.7E-11	2.1E-10	9.3E-10	2.6E-09	--
Formaldehyde	50-00-0	Yes	49.0	1.8E-06	1.6E-08	2.3E-05	3.2E-07	5.2E-09	6.3E-12	1.7E-09	1.4E-09	1.8E-09	--	--	--	2.7E-08	1.5E-05	6.6E-05	--	--
Methyl isobutyl ketone (MIBK, Hexane)	108-10-1	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Isopropylbenzene (Cumene)	98-82-8	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Hexane	110-54-3	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Isopropyl alcohol	67-63-0	Yes	3,200	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Methanol	67-56-1	Yes	28,000	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1,3,5-Trimethylbenzene	108-67-8	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Fluorides	FLUORIDES	Yes	(4)	--	--	--	--	--	--	--	--	--	--	3.2E-06	--	--	--	--	--	--
1,2,3-Trimethylbenzene	526-73-8	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Cyclohexane	110-82-7	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Bromomethane (Methyl bromide)	74-83-9	Yes	3,900	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Chloromethane (Methyl chloride)	74-87-3	Yes	1,000	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1,3-Butadiene	106-99-0	Yes	680	--	--	--	--	--	--	--	--	--	--	--	--	2.5E-08	1.4E-07	6.2E-07	--	--
1,1,1-Trichloroethane (Methyl chloroform)	71-55-4	Yes	11,000	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
1,2,4-Trimethyl benzene	95-43-6	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Dichloromethane (Methylene chloride)	75-09-2	Yes	2,100	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
2-Butanone (Methyl ethyl ketone)	78-93-3	Yes	5,000	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Phenol	108-95-2	Yes	5,800	3.9E-10	3.9E-11	1.5E-11	3.4E-15	6.9E-17	4.8E-20	3.2E-19	7.9E-21	9.3E-21	--	--	--	--	--	--	--	--
Propylene	115-10-7	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Propionaldehyde	123-38-4	No	(4)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Styrene	100-42-5	Yes	21,000	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	8.3E-12
Toluene	108-88-3	Yes	7,500	--	--	--	--	--	--	--	--	--	--	--	--	1.1E-09	6.0E-09	2.6E-08	1.1E-07	--
Xylene (mixture)	1330-20-7	Yes	8,700	--	--	--	--	--	--	--	--	--	--	--	--	3.7E-10	2.1E-09	9.1E-09	--	--
Vinyl Chloride	75-01-4	Yes	1,300	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Trichloroethylene (TCE, Trichloroethylene)	79-03-6	Yes	2,100	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
m-Xylene	108-38-3	Yes	8,700	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
p-Xylene	106-42-3	Yes	8,700	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.8E-08
o-Xylene	95-47-6	Yes	8,700	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.1E-09
Hydrogen fluoride	7664-39-3	Yes	16.0	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Hydrochloric acid	7647-01-0	Yes	2,100	--	--	--	--	--	--	--	--	--	--	--	--	6.7E-09	3.8E-08	1.7E-07	--	--
DPA	200	No	(4)	--	--	--	--</													

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**Table 4-5**  
**Kiln Thermal Buoyancy Effects Calculations**  
**Stimson Lumber Company Forest Grove Complex—Gaston, Oregon**

Parameter	EPA Memo Acronym	(Units)	Source Representation						
			KILN1	KILN2	KILN3	KILN4	KILN5	KILN6	
<b>PHYSICAL PARAMETERS</b>									
Kiln Width	(1)	--	(ft)	16.5	33.0	33.0	33.0	33.0	33.0
Kiln Length	(1)	--	(ft)	73.0	73.0	73.0	73.0	73.0	73.0
Kiln Height	(1)	--	(ft)	28.0	28.0	28.0	28.0	28.0	28.0
Kiln Flowrate	(2)	--	(acfm)	6,250	12,500	12,500	12,500	12,500	12,500
Kiln Temperature	(1)	--	(°F)	190	190	190	190	190	190
Ambient Temperature	(3)	--	(°F)	52.9	52.9	52.9	52.9	52.9	52.9
Acceleration of Gravity Constant		g	(m/s <sup>2</sup> )	9.81	9.81	9.81	9.81	9.81	9.81
<b>EFFECTIVE RELEASE HEIGHT DERIVATION</b>									
Kiln Width	(a)	w	(m)	5.03	10.06	10.06	10.06	10.06	10.06
Kiln Length	(a)	l	(m)	22.3	22.3	22.3	22.3	22.3	22.3
Kiln Height	(a)	--	(m)	8.53	8.53	8.53	8.53	8.53	8.53
Kiln Flowrate	(b)	Q	(m <sup>3</sup> /s)	2.95	5.90	5.90	5.90	5.90	5.90
Kiln Temperature	(c)	T <sub>p</sub>	(K)	361	361	361	361	361	361
Ambient Temperature	(c)	T <sub>a</sub>	(K)	285	285	285	285	285	285
Effective Radius	(d)	r <sub>p</sub>	(m)	5.97	8.44	8.44	8.44	8.44	8.44
Kiln Buoyancy Flux	(e)	F <sub>b</sub>	(m <sup>4</sup> /s <sup>3</sup> )	1.94	3.89	3.89	3.89	3.89	3.89
Initial Vertical Velocity	(f)	w <sub>p</sub>	(m/s)	2.6E-02	2.6E-02	2.6E-02	2.6E-02	2.6E-02	2.6E-02
Froude Number	(g)	F	--	5.3E-03	4.5E-03	4.5E-03	4.5E-03	4.5E-03	4.5E-03
Velocity Ratio	(h)	K	--	99	99	99	99	99	99
Brunt Visalia Frequency	(i)	N	--	0.053	0.053	0.053	0.053	0.053	0.053
Stable Plume Rise	(j)	Δh	(m)	17.11	21.55	21.55	21.55	21.55	21.55
<b>Effective Release Height</b>	(k)	--	<b>(m)</b>	<b>21.37</b>	<b>25.82</b>	<b>25.8</b>	<b>25.8</b>	<b>25.8</b>	<b>25.8</b>
<b>DISPERSION MODEL INPUT</b>									
<b>Vertical Dimension</b>	(5)	--	<b>(m)</b>	<b>21.37</b>	<b>25.82</b>	<b>25.82</b>	<b>25.82</b>	<b>25.82</b>	<b>25.82</b>
<b>Release Height</b>	(5)	--	<b>(m)</b>	<b>10.69</b>	<b>12.91</b>	<b>12.91</b>	<b>12.91</b>	<b>12.91</b>	<b>12.91</b>
<b>Initial Vertical Dimension</b>	(7)	--	<b>(m)</b>	<b>9.94</b>	<b>12.01</b>	<b>12.01</b>	<b>12.01</b>	<b>12.01</b>	<b>12.01</b>

**Notes**

ft = feet; acfm = actual cubic feet per minute; °F = degrees Fahrenheit; m/s<sup>2</sup> = meter per second squared; m = meter; K = kelvin; m<sup>4</sup>/s<sup>3</sup> = quartic meter per cubic second; m/s = meter per second.

(a) Parameter (m) = (parameter [ft]) / (3.2808 ft/m)

(b) Kiln flowrate (m<sup>3</sup>/s) = (kiln flowrate [acfm]) / (60 s/min) / (35.3147 ft<sup>3</sup>/m<sup>3</sup>)

(c) Temperature (K) = ((temperature {°F} - 32) x (5/9) + (273.15))

(d) Effective radius (m) = ((kiln width {m}) x [kiln length {m}] / [π])<sup>1/2</sup>

(e) Kiln buoyancy flux (m<sup>4</sup>/s<sup>3</sup>) = (acceleration of gravity [m/s<sup>2</sup>]) x (kiln flowrate [m<sup>3</sup>/s]) x ((kiln temperature {K}) - [ambient temperature {K}]) / (π) / (kiln temperature [K]) (4)

(f) Initial vertical velocity (m/s) = (kiln buoyancy flux [m<sup>4</sup>/s<sup>3</sup>]) x (kiln temperature [K]) / (acceleration of gravity [m/s<sup>2</sup>]) / ((kiln temperature [K]) - [ambient temperature {K}]) / (effective radius [m])<sup>2</sup> (5)

(g) Froude number = (initial vertical velocity [m/s]) / (((kiln temperature [K]) - [ambient temperature {K}]) / [kiln temperature {K}] x [2] x [effective radius {m}]) x [acceleration of gravity {m/s<sup>2</sup>}]<sup>-1/2</sup> (5)

(h) Velocity ratio = (wind speed (m/s) / (initial vertical velocity [m/s]))

Wind speed (m/s) = 2.61 (3)

(i) Brunt vasaila frequency = ((acceleration of gravity {m/s<sup>2</sup>}) / [ambient temperature {K}] x [temperature gradient {K/m}])<sup>1/2</sup> (5)

Temperature gradient (K/m) = 0.08 (5)

(j) Stable plume rise (m) = (2.1) x ((effective radius {m}) x [wind speed {m/s}]<sup>2</sup> / [velocity ratio]<sup>3</sup> / [Froude number]<sup>2</sup> / [Brunt vasaila frequency]<sup>2</sup>)<sup>1/3</sup> (5)

Wind speed (m/s) = 2.61 (3)

(k) Effective release height (m) = (stable plume rise [m]) + (kiln height [m] / 2) (6)

**References**

(1) Information provided by Stimson Lumber Company

(2) Per Appendix D2 of Appendix 1 in the EPA "Residual Risk Assessment for the Plywood and Composite Wood Products Source Category in Support of the 2019 Risk and Technology Review Proposed Rule" dated May, 2019, velocity measurement and total gas flow data indicate 12,500 acfm is representative of the total gas flow from batch kilns. Kiln 1 is one-track and is estimated to have half the airflow of the two-track batch kilns (kiln 2-6).

(3) Representative of 5-year average daily temperature and average wind speed from January 1 2020 through December 31, 2024. Value calculated using Hillsboro met station data.

(4) See Appendix 12, sub Appendix I, "Plume-Rise Methodology for Slag Pits Based Upon Work by John Irwin (EPA; 2003)," to the Residual Risk Assessment for the Plywood and Composite Wood Products Source Category in Support of the 2019 Risk and Technology Review Proposed Rule dated May, 2019. Formula for initial vertical velocity rearranged to solve for buoyancy flux.

(5) See Appendix 12, sub Appendix I, "Plume-Rise Methodology for Slag Pits Based Upon Work by John Irwin (EPA; 2003)," to the Residual Risk Assessment for the Plywood and Composite Wood Products Source Category in Support of the 2019 Risk and Technology Review Proposed Rule dated May, 2019.

(6) See section III of Appendix 12, "Development of Plume-Rise Adjustment Factors for Batch and Continuous Lumber Kilns," to the Residual Risk Assessment for the Plywood and Composite Wood Products Source Category in Support of the 2019 Risk and Technology Review Proposed Rule dated May, 2019.

(7) See "User's Guide for the AMS/EPA Regulatory Model (AERMOD)" dated November 2024. See Table 3-2. The initial vertical dimension for elevated sources on or adjacent to a building is equal to the release height divided by 2.15.

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**Table 4-6  
Kiln Emissions Allocation  
Stimson Lumber Company Forest Grove Complex—Gaston, Oregon**

Model ID	Model Source Description	Kiln Track (Single/Double)	Emissions Distribution per Kiln	Emissions Distribution per modeled source
<b>Kiln 1</b>		<b>Single</b>	<b>0.091</b> <sup>(a)</sup>	--
KILN1_1	Kiln 1 (1 of 4)	--	--	0.023 <sup>(b)</sup>
KILN1_2	Kiln 1 (3 of 4)	--	--	0.023 <sup>(b)</sup>
KILN1_3	Kiln 1 (2 of 4)	--	--	0.023 <sup>(b)</sup>
KILN1_4	Kiln 1 (4 of 4)	--	--	0.023 <sup>(b)</sup>
<b>Kiln 2</b>		<b>Double</b>	<b>0.182</b> <sup>(c)</sup>	--
KILN2_1	Kiln 2 (1 of 3)	--	--	0.061 <sup>(d)</sup>
KILN2_2	Kiln 2 (2 of 3)	--	--	0.061 <sup>(d)</sup>
KILN2_3	Kiln 2 (3 of 3)	--	--	0.061 <sup>(d)</sup>
<b>Kiln 3</b>		<b>Double</b>	<b>0.182</b> <sup>(c)</sup>	--
KILN3_1	Kiln 3 (1 of 3)	--	--	0.061 <sup>(d)</sup>
KILN3_2	Kiln 3 (2 of 3)	--	--	0.061 <sup>(d)</sup>
KILN3_3	Kiln 3 (3 of 3)	--	--	0.061 <sup>(d)</sup>
<b>Kiln 4</b>		<b>Double</b>	<b>0.182</b> <sup>(c)</sup>	--
KILN4_1	Kiln 4 (1 of 3)	--	--	0.061 <sup>(d)</sup>
KILN4_2	Kiln 4 (2 of 3)	--	--	0.061 <sup>(d)</sup>
KILN4_3	Kiln 4 (3 of 3)	--	--	0.061 <sup>(d)</sup>
<b>Kiln 5</b>		<b>Double</b>	<b>0.182</b> <sup>(c)</sup>	--
KILN5_1	Kiln 5 (1 of 3)	--	--	0.061 <sup>(d)</sup>
KILN5_2	Kiln 5 (2 of 3)	--	--	0.061 <sup>(d)</sup>
KILN5_3	Kiln 5 (3 of 3)	--	--	0.061 <sup>(d)</sup>
<b>Kiln 6</b>		<b>Double</b>	<b>0.182</b> <sup>(c)</sup>	--
KILN6_1	Kiln 6 (1 of 3)	--	--	0.061 <sup>(d)</sup>
KILN6_2	Kiln 6 (2 of 3)	--	--	0.061 <sup>(d)</sup>
KILN6_3	Kiln 6 (3 of 3)	--	--	0.061 <sup>(d)</sup>
<b>Total Fraction</b>			<b>1.00</b>	<b>1.00</b>

**Notes**

<sup>(a)</sup> Emissions Distribution per single track kiln = (tracks per kilns) / (total number of tracks)

Total number of tracks = 11 (1)

Tracks per kiln (single) = 1 (2)

<sup>(b)</sup> Emissions Distribution per model source (kiln 1) = (emissions distribution per single track kiln) / (number of volume sources)

Number of volume sources = 4

<sup>(c)</sup> Emissions Distribution per double track kiln = (tracks per kilns) / (total number of tracks)

Total number of tracks = 11 (1)

Tracks per kiln (double) = 2 (2)

<sup>(d)</sup> Emissions distribution per model source (kilns 2-6) = (emissions distribution per single double track kiln) / (number of volume sources)

Number of volume sources = 3

**References**

(1) Representative of the total number of tracks for all six kilns at the facility.

(2) Information provided by Stimson Lumber Company.

(3) Number of volume sources set by the dimensions of each kiln.

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**Table 5-4**  
**Assessment of Missing Meteorological Data**  
**Stimson Lumber Company Forest Grove Complex—Gaston, Oregon**

Quarter <sup>(1)</sup>	Meteorological Data Assessment per Year														
	2020			2021			2022			2023			2024		
	Total Hours <sup>(1)</sup>	Missing Hours <sup>(2)</sup>	Available <sup>(a)</sup> (%)	Total Hours <sup>(1)</sup>	Missing Hours <sup>(2)</sup>	Available <sup>(a)</sup> (%)	Total Hours <sup>(1)</sup>	Missing Hours <sup>(2)</sup>	Available <sup>(a)</sup> (%)	Total Hours <sup>(1)</sup>	Missing Hours <sup>(2)</sup>	Available <sup>(a)</sup> (%)	Total Hours <sup>(1)</sup>	Missing Hours <sup>(2)</sup>	Available <sup>(a)</sup> (%)
Q1	2,184	8	99.6%	2,160	94	95.6%	2,160	5	99.8%	2,160	36	98.3%	2,184	37	98.3%
Q2	2,184	6	99.7%	2,184	54	97.5%	2,184	14	99.4%	2,184	58	97.3%	2,184	169	92.3%
Q3	2,208	13	99.4%	2,208	27	98.8%	2,208	24	98.9%	2,208	45	98.0%	2,208	29	98.7%
Q4	2,208	47	97.9%	2,208	23	99.0%	2,208	18	99.2%	2,208	43	98.1%	2,208	29	98.7%

**Notes**

<sup>(a)</sup> Available hours (%) = (1 - [{missing hours} / {total hours}]) x (100%)

**References**

<sup>(1)</sup> Meteorological data obtained from the National Oceanic and Atmospheric Administration National Climatic Data Center Integrated Surface Data for the Portland-Hillsboro Airport located in Hillsboro, Oregon (WBAN: 94261).

<sup>(2)</sup> The number of missing hours was determined by generating a SFC QA excel file generated by AERMET version 24142.

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**Table 5-6**  
**Soil Moisture Condition Assessment**  
**Stimson Lumber Company Forest Grove Complex—Gaston, Oregon**

Calendar Year	Total Precipitation <sup>(1)</sup> (in)	Climatic Significance <sup>(2)</sup> (in)	Calendar Year Soil Moisture <sup>(3)</sup> (in)
2020	29.2	Lower 30th Percentile	DRY
2021	36.1	Middle 40th Percentile	AVG
2022	35.8	Middle 40th Percentile	AVG
2023	30.7	Middle 40th Percentile	AVG
2024	41.0	Upper 70th Percentile	WET

26-Year Climate Precipitation Data <sup>(4)</sup>		
Average Annual Precipitation	<sup>(5)</sup>	34.4
Lower 30th Percentile Annual Precipitation	<sup>(6)</sup>	29.6
Upper 70th Percentile Annual Precipitation	<sup>(7)</sup>	39.3

**References**

- <sup>(1)</sup> Climatological data obtained from the National Center for Environmental Information for the Portland-Hillsboro Airport (Hillsboro met station) in Hillsboro, OR (Station ID: 94261). MFA determined the Hillsboro met station is the most representative station for dispersion modeling as is the same station used for insitu surface meteorological data. Although the Hillsboro met station only has 26-consecutive years of precipitation data, MFA believes this period is sufficient for assessing climatological soil moisture conditions for dispersion modeling purposes.
- <sup>(2)</sup> Climatic significance represents annual precipitation compared to 30-year climatological period.
- <sup>(3)</sup> Surface moisture conditions correspond to "Dry", "Average" or "Wet" soil content determined by comparing annual precipitation to 30-year climatological period. This method is consistent with the methodology set forth in the current version of the USEPA AERSURFACE User's Guide dated November, 2024.
- <sup>(4)</sup> Represents 26-year period between January 1999 and December 2024.
- <sup>(5)</sup> Represents average annual precipitation during 26-year climatological period.
- <sup>(6)</sup> Represents lower limit of middle 40th percentile annual precipitation during 26-year climatological period.
- <sup>(7)</sup> Represents upper limit of middle 40th percentile annual precipitation during 26-year climatological period.

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**Table 5-7**  
**Summary of Downwash Structure Heights**  
**Stimson Lumber Company Forest Grove Complex—Gaston, Oregon**

Downwash Structure Model ID	Base Elevation <sup>(1)</sup>		Number of Building Tiers	Tier Height <sup>(2)</sup>		Diameter <sup>(2)</sup>	
	(ft)	(m)		(ft)	(m)	(ft)	(m)
HBOARD	216.1	65.9	1	49.0	14.9	--	--
HBOARD	216.1	65.9	2	49.0	14.9	--	--
OFFICES	216.4	66.0	1	37.8	11.5	--	--
HB1	215.8	65.8	1	31.0	9.5	--	--
HB2	215.0	65.5	1	26.5	8.1	--	--
HB3	215.6	65.7	1	29.0	8.8	--	--
HB4	216.1	65.9	1	18.2	5.6	--	--
TANK1	214.6	65.4	1	60.0	18.3	32.3	9.8
TANK2	214.4	65.4	1	60.0	18.3	32.3	9.8
TANK3	215.1	65.6	1	32.3	9.8	32.6	9.9
BLD_1	214.8	65.5	1	27.9	8.5	--	--
BLD_2	212.1	64.6	1	35.8	10.9	--	--
BLD_3	213.7	65.1	1	16.1	4.9	--	--
BLD_4	211.3	64.4	1	13.7	4.2	--	--
BLD_10	224.6	68.5	1	28.7	8.8	--	--
BLD_11	211.9	64.6	1	53.1	16.2	--	--
BLD_12	213.8	65.2	1	18.0	5.5	--	--
BLD_13	213.7	65.1	1	25.0	7.6	--	--
BLD_17	213.0	64.9	1	29.5	9.0	--	--
BLD_18	215.3	65.6	1	10.8	3.3	--	--
BLD_23	211.6	64.5	1	47.0	14.3	--	--
BLD_24	212.9	64.9	1	31.9	9.7	--	--
BLD_25	213.4	65.0	1	24.7	7.5	--	--
BLD_26	212.5	64.8	1	27.1	8.3	--	--
BLD_22	214.9	65.5	1	49.0	14.9	--	--
BLD_28	213.5	65.1	1	30.3	9.2	--	--
BLD_21	221.1	67.4	1	29.0	8.8	--	--
BLD_29	221.3	67.5	1	28.0	8.5	--	--
BLD_30	219.5	66.9	1	20.0	6.1	--	--
BLD_30	219.5	66.9	2	20.0	6.1	--	--
BLD_30	219.5	66.9	3	20.0	6.1	--	--
BLD_30	219.5	66.9	4	20.0	6.1	--	--
BLD_31	218.5	66.6	1	20.0	6.1	--	--
BLD_31	218.5	66.6	2	20.0	6.1	--	--
BLD_31	218.5	66.6	3	20.0	6.1	--	--
BLD_31	218.5	66.6	4	20.0	6.1	--	--
BLD_32	219.7	67.0	1	24.8	7.6	--	--
BLD_33	221.6	67.5	1	24.5	7.5	--	--
BLD_34	215.6	65.7	1	20.0	6.1	--	--
BLD_34	215.6	65.7	2	20.0	6.1	--	--
BLD_34	215.6	65.7	3	20.0	6.1	--	--
BLD_34	215.6	65.7	4	20.0	6.1	--	--
BLD_35	217.5	66.3	1	20.0	6.1	--	--
BLD_35	217.5	66.3	2	20.0	6.1	--	--
BLD_35	217.5	66.3	3	20.0	6.1	--	--
BLD_35	217.5	66.3	4	20.0	6.1	--	--
BLD_35	217.5	66.3	5	20.0	6.1	--	--
SAW1	217.1	66.2	1	55.0	16.8	--	--
SAW1.B	217.1	66.2	1	29.0	8.8	--	--
SAW2.A	217.1	66.2	1	30.0	9.1	--	--
SAW2.B	217.1	66.2	1	27.5	8.4	--	--

**References**

<sup>(1)</sup> Base elevation derived from 1/3-arc second US Geological Survey National Elevation Dataset.

<sup>(2)</sup> Information provided by Stimson Lumber Company.

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**Table 6-1  
Proposed Secondary Impacts from PM<sub>2.5</sub> Precursors  
Stimson Lumber Company Forest Grove Complex—Gaston, Oregon**

Precursor	Proposed Annual Emissions Estimate (tons/yr)	Hypothetical Facility MERP for 24-Hour PM <sub>2.5</sub> (tons/yr)
NO <sub>x</sub>	117.7 <sup>(1)</sup>	3,003 <sup>(2)</sup>
SO <sub>2</sub>	4.62 <sup>(1)</sup>	1,203 <sup>(2)</sup>

Pollutant and Averaging Period	Class II SIL (ug/m <sup>3</sup> )	Secondary Impact		Additive Secondary Impact Percentage Less than 100%?
		Concentration (ug/m <sup>3</sup> )	Percent of SIL	
PM <sub>2.5</sub> 24-Hour	1.2 <sup>(3)</sup>	5.2E-02 <sup>(a)</sup>	4.30 <sup>(b)</sup>	Yes <sup>(4)</sup>

**Notes**

MERP = modeled emission rates for precursors; ppb = parts per billion; SIL = Significant Impact Level; tons/yr = tons per year; ug/m<sup>3</sup> = microgram per cubic meter.

- <sup>(a)</sup> PM<sub>2.5</sub> daily secondary impact concentration (ug/m<sup>3</sup>) = ([proposed annual NO<sub>x</sub> emissions estimate {tons/yr}] / [hypothetical facility NO<sub>x</sub> MERP for 24-hour PM<sub>2.5</sub> {tons/yr}] + [proposed annual SO<sub>2</sub> emissions estimate {tons/yr}] / [hypothetical facility SO<sub>2</sub> MERP for 24-hour PM<sub>2.5</sub> {tons/yr}]) x (PM<sub>2.5</sub> 24-hour class II SIL [ug/m<sup>3</sup>])
- <sup>(b)</sup> Secondary impact percent of SIL (%) = (secondary impact concentration [ug/m<sup>3</sup>] / (class II SIL [ug/m<sup>3</sup>]) x (100%)

**References**

- <sup>(1)</sup> See Table 3, "Permitting Applicability Summary", in Appendix A of the Construction ACDP application.
- <sup>(2)</sup> EPA, "Guidance on the Development of Modeled Emission Rates for Precursors (MERPs) as a Tier I Demonstration Tool for O<sub>3</sub> and PM<sub>2.5</sub> under the PSD Permitting Program," April 30, 2019. Table 4-1 "Lowest, median, and highest illustrative MERP values (tons/yr) by precursor, pollutant and climate zone." Conservatively assumes the lowest MERP values for the Northwest climate zone as the most-representative of the Portland area.
- <sup>(3)</sup> Oregon Administrative Rule 340-200-0020(162)(b).
- <sup>(4)</sup> EPA, "Guidance on the Development of Modeled Emission Rates for Precursors (MERPs) as a Tier I Demonstration Tool for O<sub>3</sub> and PM<sub>2.5</sub> under the PSD Permitting Program," April 30, 2019. Per Section 4.1, a value less than 100% indicates that the SIL would not be exceeded when considering the combined impacts of the applicable precursors.

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**Table 6-2**  
**Competing Source Emissions Inventory**  
**Stimson Lumber Company Forest Grove Complex—Gaston, Oregon**

Model ID	Model Source Description	PM <sub>2.5</sub> Emission Rate		UTM Coordinates <sup>(1)</sup>		Distance from Facility <sup>(1)</sup>	Base Elevation <sup>(2)</sup>	Release Height <sup>(1)</sup>	Exit Diameter <sup>(1)</sup>	Exit Velocity <sup>(1)</sup>	Exit Flowrate <sup>(1)</sup>	Exit Temperature <sup>(1)</sup>
		(tons/day) <sup>(1)</sup>	(g/s) <sup>(a)</sup>	Easting	Northing	(km)	(m)	(ft)	(ft)	(ft/s)	(cfm)	(°F)
FLS_BGH	Fox Lumber Sales, Inc. Baghouse	2.19E-06	2.30E-05	#REF!	#REF!	0.1	65.6	40.0	5.0	40.00	47,100	72.0
DMH_WWL	DMH, Inc. Woodwaste Loadout	1.63E-03	1.71E-02	493,682	5,041,244	10.6						

<sup>(3)</sup>

**Notes**

g/s = grams per second; m = meter; ft = feet; ft/s = feet per second; cfm = cubic feet per minute; UTM = universal transverse mercator; °F = degrees Fahrenheit; km = kilometer; ROI = Range of Influence.

<sup>(a)</sup> Emission rate (g/s) = (emission rate [tons/day]) x (2,000 lb/ton) x (453.59 g/lb) / (24 hr/day) / (3,600 s/hr)

**References**

<sup>(1)</sup> Competing source inventory provided by the DEQ on February 27, 2025.

<sup>(2)</sup> Value derived from AERMAP terrain preprocessor.

<sup>(3)</sup> The DMH, Inc. Woodwaste Loadout source was reassessed using an updated ROI value of 5.6 km. The updated ROI was based on a decrease in facility-wide PTE PM<sub>2.5</sub> emissions to 28 tons per year. This competing source was determined to be outside of the ROI and therefore MFA is proposing to not include it with the short-term PM<sub>2.5</sub> cumulative impact analysis.

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**Table 6-3**  
**Proposed Assessments, Background Concentrations, and Preliminary AAQS Review**  
**Stimson Lumber Company Forest Grove Complex—Gaston, Oregon**

Pollutant	Averaging Period	Modeling Components (ug/m <sup>3</sup> )						
		Modeled Background Concentration <sup>(1)</sup>					AAQS <sup>(2)</sup>	Preliminary AAQS Review Value <sup>(a)</sup>
		NE Location	SE Location	SW Location	NW Location	Average		
PM <sub>2.5</sub>	24-hour	18.7	17.4	14.0	13.7	16.0	35	19.0

**Notes**

AAQS = Ambient Air Quality Standard; SIL = Significant Impact Level; ug/m<sup>3</sup> = micrograms per cubic meter.

<sup>(a)</sup> Preliminary AAQS review value (ug/m<sup>3</sup>) = (AAQS [ug/m<sup>3</sup>]) - (proposed background concentration [ug/m<sup>3</sup>])

**References**

<sup>(1)</sup> NW-AIRQUEST Regional Background Design Values 2014-2017. <https://idahodeq.maps.arcgis.com>. Accessed February 27, 2025.

<sup>(2)</sup> Oregon Administrative Rule 340-202-0060(2).

**Table 7-1**  
**Applicable Risk-Based Concentrations**  
**Stimson Lumber Company Forest Grove Complex—Gaston, Oregon**

TAC	CAS or DEQ ID	CAS or DEQ ID (Hidden)	RBC? (Yes/No)	Noncancer TBACT RAL <sup>(1)</sup>	Risk-Based Concentration <sup>(1)</sup> (ug/m <sup>3</sup> )						
					Residential Chronic		Non-Residential Chronic				Acute
					Cancer	Noncancer	Child Cancer	Child Noncancer	Worker Cancer	Worker Noncancer	Noncancer
Antimony and compounds	7440-36-0	7440-36-0	Yes	H13	--	0.30	--	1.30	--	1.30	1.00
Arsenic and compounds	7440-38-2	7440-38-2	Yes	H13	2.4E-05	1.7E-04	1.3E-03	2.4E-03	6.2E-04	2.4E-03	0.20
Beryllium and compounds	7440-41-7	7440-41-7	Yes	H13	4.2E-04	7.0E-03	0.011	0.031	5.0E-03	0.031	0.020
Cadmium and compounds	7440-43-9	7440-43-9	Yes	H13	5.6E-04	5.0E-03	0.014	0.037	6.7E-03	0.037	0.030
Chromium VI	18540-29-9	185402999	Yes	H13	3.1E-05	0.083	5.2E-04	0.88	1.0E-03	0.88	0.30
Cobalt and compounds	7440-48-4	7440-48-4	Yes	H13	--	0.10	--	0.44	--	0.44	--
Aluminum and compounds	7429-90-5	7429-90-5	Yes	H15	--	5.00	--	22.0	--	22.0	--
Copper and compounds	7440-50-8	7440-50-8	Yes	H13	--	--	--	--	--	--	100
Lead and compounds	7439-92-1	7439-92-1	Yes	H13	--	0.15	--	0.66	--	0.66	0.15
Manganese and compounds	7439-96-5	7439-96-5	Yes	H13	--	0.090	--	0.40	--	0.40	0.30
Mercury and compounds	7439-97-6	7439-97-6	Yes	H13	--	0.077	--	0.63	--	0.63	0.60
Nickel and compounds	7440-02-0	7440020in	Yes	H13	--	0.014	--	0.062	--	0.062	0.20
Selenium and compounds	7782-49-2	7782-49-2	Yes	H13	--	--	--	--	--	--	2.00
Vanadium (fume or dust)	7440-62-2	7440-62-2	Yes	H13	--	0.10	--	0.44	--	0.44	0.80
Acetaldehyde	75-07-0	75-07-0	Yes	H13	0.45	140	12.0	620	5.50	620	470
Acetone	67-64-1	67-64-1	Yes	H13	--	31,000	--	140,000	--	140,000	62,000
Acrolein	107-02-8	107-02-8	Yes	H15	--	0.35	--	1.50	--	1.50	6.90
Ammonia	7664-41-7	7664-41-7	Yes	H13	--	500	--	2,200	--	2,200	1,200
Benzene	71-43-2	71-43-2	Yes	H13	0.13	3.00	3.30	13.0	1.50	13.0	29.0
Carbon tetrachloride	56-23-5	56-23-5	Yes	H13	0.17	100	4.30	440	2.00	440	1,900
Chlorine	7782-50-5	7782-50-5	Yes	H13	--	0.15	--	0.66	--	0.66	170
Ethylene glycol monobutyl ether	111-76-2	111-76-2	Yes	H13	--	82.0	--	360	--	360	29,000
Epichlorohydrin	106-89-8	106-89-8	Yes	H13	0.043	3.00	1.10	13.0	0.52	13.0	1,300
Vinyl acetate	108-05-4	108-05-4	Yes	H13	--	200	--	880	--	880	200
Chlorobenzene	108-90-7	108-90-7	Yes	H13	--	50.0	--	220	--	220	--
Chloroform	67-66-3	67-66-3	Yes	H13	--	300	--	1,300	--	1,300	490
1,2-Dichloropropane (Propylene dichloride)	78-87-5	78-87-5	Yes	H13	--	4.00	--	18.0	--	18.0	230
3-Methylcholanthrene	56-49-5	56-49-5	Yes	--	1.6E-04	--	4.1E-03	--	1.9E-03	--	--
7,12-Dimethylbenz[a]anthracene	57-97-6	57-97-6	Yes	--	1.4E-05	--	3.7E-04	--	1.7E-04	--	--
Ethyl benzene	100-41-4	100-41-4	Yes	H13	0.40	260	10.0	1,100	4.80	1,100	22,000
Formaldehyde	50-00-0	50-00-0	Yes	H13	0.17	9.00	4.30	40.0	2.00	40.0	49.0
Methyl isobutyl ketone (MIBK, Hexone)	108-10-1	108-10-1	Yes	H13	--	3,000	--	13,000	--	13,000	--
Isopropylbenzene (Cumene)	98-82-8	98-82-8	Yes	H13	--	400	--	1,800	--	1,800	--
Hexane	110-54-3	110-54-3	Yes	H13	--	700	--	3,100	--	3,100	--
Isopropyl alcohol	67-63-0	67-63-0	Yes	H13	--	200	--	880	--	880	3,200
Methanol	67-56-1	67-56-1	Yes	H13	--	4,000	--	18,000	--	18,000	28,000
1,3,5-Trimethylbenzene	108-67-8	108-67-8	Yes	H13	--	60.0	--	260	--	260	--
Fluorides	239	239	Yes	H13	--	2.30	--	20.0	--	20.0	240
1,2,3-Trimethylbenzene	526-73-8	526-73-8	Yes	H13	--	60.0	--	260	--	260	--
Cyclohexane	110-82-7	110-82-7	Yes	H13	--	6,000	--	26,000	--	26,000	--
Bromomethane (Methyl bromide)	74-83-9	74-83-9	Yes	H13	--	5.00	--	22.0	--	22.0	3,900
Chloromethane (Methyl chloride)	74-87-3	74-87-3	Yes	H13	--	90.0	--	400	--	400	1,000
1,3-Butadiene	106-99-0	106-99-0	Yes	H13	0.033	2.00	0.86	8.80	0.40	8.80	660
1,1,1-Trichloroethane (Methyl chloroform)	71-55-6	71-55-6	Yes	H13	--	5,000	--	22,000	--	22,000	11,000
1,2,4-Trimethyl benzene	95-63-6	95-63-6	Yes	H13	--	60.0	--	260	--	260	--
Dichloromethane (Methylene chloride)	75-09-2	75-09-2	Yes	H13	59.0	600	620	2,600	1,200	2,600	2,100
2-Butanone (Methyl ethyl ketone)	78-93-3	78-93-3	Yes	H13	--	5,000	--	22,000	--	22,000	5,000
Phenol	108-95-2	108-95-2	Yes	H13	--	200	--	880	--	880	5,800
Propylene	115-07-1	115-07-1	Yes	H13	--	3,000	--	13,000	--	13,000	--
Propionaldehyde	123-38-6	123-38-6	Yes	H15	--	8.00	--	35.0	--	35.0	--
Styrene	100-42-5	100-42-5	Yes	H13	--	1,000	--	4,400	--	4,400	21,000
Toluene	108-88-3	108-88-3	Yes	H13	--	5,000	--	22,000	--	22,000	7,500
Xylene (mixture)	1330-20-7	1330-20-7	Yes	H13	--	220	--	970	--	970	8,700
Vinyl Chloride	75-01-4	75-01-4	Yes	H13	0.11	100	0.22	440	2.70	440	1,300
Trichloroethene (TCE, trichloroethylene)	79-01-6	79-01-6	Yes	H13	0.20	2.10	3.50	9.20	2.90	9.20	2.10
m-Xylene	108-38-3	108-38-3	Yes	H13	--	200	--	880	--	880	8,700
p-Xylene	106-42-3	106-42-3	Yes	H13	--	200	--	880	--	880	8,700
o-Xylene	95-47-6	95-47-6	Yes	H13	--	200	--	880	--	880	8,700
Hydrogen fluoride	7664-39-3	7664-39-3	Yes	H13	--	2.10	--	19.0	--	19.0	16.0
Hydrochloric acid	7647-01-0	7647-01-0	Yes	H13	--	20.0	--	88.0	--	88.0	2,100
DPM	200	200	Yes	H13	0.10	5.00	2.60	22.0	1.20	22.0	--
PAHs (excluding Naphthalene)	401	401	Yes	--	4.3E-05	--	1.6E-03	--	3.0E-03	--	--
Benzo[a]anthracene	56-55-3	56-55-3	Yes	--	2.1E-04	--	7.8E-03	--	0.015	--	--
Benzo[a]pyrene	50-32-8	50-32-8	Yes	H13	4.3E-05	2.0E-03	1.6E-03	8.8E-03	3.0E-03	8.8E-03	2.0E-03
Benzo[b]fluoranthene	205-99-2	205-99-2	Yes	--	5.3E-05	--	2.0E-03	--	3.8E-03	--	--
Benzo[g,h,i]perylene	191-24-2	191-24-2	Yes	--	4.7E-03	--	0.17	--	0.34	--	--
Benzo[j]fluoranthene	205-82-3	205-82-3	Yes	--	1.4E-04	--	5.2E-03	--	0.010	--	--
Benzo[k]fluoranthene	207-08-9	207-08-9	Yes	--	1.4E-03	--	0.052	--	0.10	--	--
Chrysene	218-01-9	218-01-9	Yes	--	4.3E-04	--	0.016	--	0.030	--	--
Fluoranthene	206-44-0	206-44-0	Yes	--	5.3E-04	--	0.020	--	0.038	--	--
Indeno[1,2,3-cd]pyrene	193-39-5	193-39-5	Yes	--	6.1E-04	--	0.022	--	0.043	--	--
Naphthalene	91-20-3	91-20-3	Yes	H13	0.029	3.70	0.76	16.0	0.35	16.0	200
2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)	1746-01-6	1746-01-6	Yes	H13	1.0E-09	1.3E-07	9.0E-08	2.6E-05	4.2E-08	2.6E-05	--
1,2,3,7,8-Pentachlorodibenzo-p-dioxin (PeCDD)	40321-76-4	40321-76-4	Yes	H13	1.0E-09	1.3E-07	9.0E-08	2.6E-05	4.2E-08	2.6E-05	--
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin (HxCDD)	39227-28-6	39227-28-6	Yes	H13	1.0E-08	1.3E-06	9.0E-07	2.6E-04	4.2E-07	2.6E-04	--
1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin (HxCDD)	57653-85-7	57653-85-7	Yes	H13	1.0E-08	1.3E-06	9.0E-07	2.6E-04	4.2E-07	2.6E-04	--
1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin (HxCDD)	19408-74-3	19408-74-3	Yes	H13	1.0E-08	1.3E-06	9.0E-07	2.6E-04	4.2E-07	2.6E-04	--
1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin (HpCDD)	35822-46-9	35822-46-9	Yes	H13	1.0E-07	1.3E-05	9.0E-06	2.6E-03	4.2E-06	2.6E-03	--
Octachlorodibenzo-p-dioxin (OCDD)	3268-87-9	3268-87-9	Yes	H13	3.4E-06	4.2E-04	3.0E-04	0.085	1.4E-04	0.085	--
2,3,7,8-Tetrachlorodibenzofuran (TcDF)	51207-31-9	51207-31-9	Yes	H13	1.0E-08	1.3E-06	9.0E-07	2.6E-04	4.2E-07	2.6E-04	--
1,2,3,7,8-Pentachlorodibenzofuran (PeCDF)	57117-41-6	57117-41-6	Yes	H13	3.4E-08	4.2E-06	3.0E-06	8.5E-04	1.4E-06	8.5E-04	--
2,3,4,7,8-Pentachlorodibenzofuran (PeCDF)	57117-31-4	57117-31-4	Yes	H13	3.4E-09	4.2E-07	3.0E-07	8.5E-05	1.4E-07	8.5E-05	--
1,2,3,4,7,8-Hexachlorodibenzofuran (HxCDF)	70648-26-9	70648-26-9	Yes	H13	1.0E-08	1.3E-06	9.0E-07	2.6E-04	4.2E-07	2.6E-04	--
1,2,3,6,7,8-Hexachlorodibenzofuran (HxCDF)	57117-44-9	57117-44-9	Yes	H13	1.0E-08	1.3E-06	9.0E-07	2.6E-04	4.2E-07	2.6E-04	--
1,2,3,7,8,9-Hexachlorodibenzofuran (HxCDF)	72918-21-9	72918-21-9	Yes	H13	1.0E-08	1.3E-06	9.0E-07	2.6E-04	4.2E-07	2.6E-04	--
2,3,4,6,7,8-Hexachlorodibenzofuran (HxCDF)	60851-34-5	60851-34-5	Yes	H13	1.0E-08	1.3E-06	9.0E-07	2.6E-04	4.2E-07	2.6E-04	--
1,2,3,4,6,7,8-Heptachlorodibenzofuran (HpCDF)	67562-39-4	67562-39-4	Yes	H13	1.0E-07	1.3E-05	9.0E-06	2.6E-03	4.2E-06	2.6E-03	--
1,2,3,4,7,8,9-Heptachlorodibenzofuran (HpCDF)	55673-89-7	55673-89-7	Yes	H13	1.0E-07	1.3E-05	9.0E-06	2.6E-03	4.2E-06	2.6E-03	--
Octachlorodibenzofuran (OCDF)	39001-02-0	39001-02-0	Yes	H13	3.4E-06	4.2E-04	3.0E-04	0.085	1.4E-04	0.085	--
Total PCBs	1336-36-3	1336-36-3	Yes	--	5.3E-04	--	0.020	--	9.2E-03	--	--
2,4-Dinitrotoluene	121-14-2	121-14-2	Yes	--	0.011	--	0.29	--	0.13	--	--
Bis(2-ethylhexyl) phthalate (DEHP)	117-81-7	117-81-7	Yes	--	0.080	--	11.0	--	5.00	--	--
Hydrogen cyanide	74-90-8	74-90-8	Yes	H13	--	0.80	--	3.50	--	3.50	340
Ethylene dichloride (EDC, 1,2-dichloroethane)	107-06-2	107-06-2	Yes	H13	0.038	7.00	1.00	31.0	0.46	31.0	--
p-Dichlorobenzene (1,4-Dichlorobenzene)	106-46-7	106-46-7	Yes	H13	0.091	60.0	2.40	260	1.10	260	12,000
2,4,6-Trichlorophenol	88-06-2	88-06-2	Yes	--	0.050	--	1.30	--	0.60	--	--
Pentachlorophenol	87-86-5	87-86-5	Yes	--	0.20	--	5.10	--	2.40	--	--
Tetrachloroethene (Perchloroethylene)	127-18-4	127-18-4	Yes	H13	3.80	41.0	100	180	46.0	180	41.0

**Notes**  
TAC = toxic air contaminant; ug/m<sup>3</sup> = micrograms per cubic meter; RAL = risk action level; RBC = risk based concentration.

**References**  
<sup>(1)</sup> See Oregon Administrative Rule 340-245-8010 Table 2.

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**Table 7-2**  
**List of TACs with No Published Risk-Based Concentrations**  
**Stimson Lumber Company Forest Grove Complex—Gaston, Oregon**

Toxic Air Contaminant	CAS or DEQ ID	Risk-Based Concentration? <sup>(1)</sup> (Yes/No)
Barium and compounds	7440-39-3	No
Zinc oxide	1314-13-2	No
Phosphorus and compounds	504	No
Molybdenum trioxide	1313-27-5	No
Silver and compounds	7440-22-4	No
Thallium and compounds	7440-28-0	No
Zinc and compounds	7440-66-6	No
Acetophenone	98-86-2	No
Butyl benzyl phthalate	85-68-7	No
Dipropylene glycol monomethyl ether	34590-94-8	No
Crotonaldehyde	4170-30-3	No
Dibutyl phthalate	84-74-2	No
Diethylphthalate	84-66-2	No
Acenaphthene	83-32-9	No
Acenaphthylene	208-96-8	No
Anthracene	120-12-7	No
Benzo[e]pyrene	192-97-2	No
Fluorene	86-73-7	No
2-Methyl naphthalene	91-57-6	No
Perylene	198-55-0	No
Phenanthrene	85-01-8	No
Pyrene	129-00-0	No
Decachlorobiphenyl	2051-24-3	No
1-Methylphenanthrene	832-69-9	No
4,6-Dinitro-o-cresol (and salts)	534-52-1	No
di-n-octylphthalateb	518	No
4-nitrophenol	100-02-7	No
2-Chlorophenol	95-57-8	No
2,4-Dinitrophenol	51-28-5	No
Trichlorofluoromethane (Freon 11)	75-69-4	No

**References**

<sup>(1)</sup> See Oregon Administrative Rule 340-245-8010 Table 2.

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**Table 8-1  
AAQS Modeling Results  
Stimson Lumber Company Forest Grove Complex—Gaston, Oregon**

Pollutant	Averaging Period	NAAQS <sup>(1)</sup> (ug/m <sup>3</sup> )	Background Conc. <sup>(2)</sup> (ug/m <sup>3</sup> )	PM <sub>2.5</sub> Daily Secondary Impact <sup>(3)</sup> (ug/m <sup>3</sup> )	Maximum Predicted Conc. <sup>(4)</sup> (ug/m <sup>3</sup> )	Design Value <sup>(a)</sup> (ug/m <sup>3</sup> )	Design Value Exceeds AAQS? (Yes or No)	Percent of AAQS <sup>(b)</sup> (%)
PM <sub>2.5</sub>	24-hour	35	16.0	0.052	4.47	20.5	No	58.6

**Notes**

ug/m<sup>3</sup> = microgram per cubic meter; AAQS = Ambient Air Quality Standard.

<sup>(a)</sup> Design value (ug/m<sup>3</sup>) = (maximum predicted concentration [ug/m<sup>3</sup>]) + (background concentration [ug/m<sup>3</sup>])

<sup>(b)</sup> Percent of AAQS (%) = (design value [ug/m<sup>3</sup>]) / (AAQS [ug/m<sup>3</sup>]) x (100%)

**References**

<sup>(1)</sup> Oregon Administrative Rule 340-202-0060(2).

<sup>(2)</sup> See Table 6-3, Proposed Assessments, Background Concentrations, and Preliminary AAQS Review.

<sup>(3)</sup> See Table 6-1, Proposed Secondary Impacts from PM<sub>2.5</sub> Precursors.

<sup>(4)</sup> Attainment with the 24-hour PM<sub>2.5</sub> standard is achieved when the average of annual 98th percentile of 24-hour concentrations is equal to or less than the standard. Value represents the highest of the eighth high concentration obtained from the AERMOD output file.

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**Table 8-2**  
**Maximum Predicted Risk Exposure Location per Significant TEU (Chronic Only)**  
**Stimson Lumber Company Forest Grove Complex—Gaston, Oregon**

Modeled Toxic Emission Unit	Cancer						Noncancer					
	Residential		Worker		Child		Residential		Worker		Child	
	Exposure Location <sup>(1)</sup> (Location of Maximum Risk)	Dispersion Factor (ug/m <sup>3</sup> /[g/s])	Exposure Location <sup>(1)</sup> (Location of Maximum Risk)	Dispersion Factor (ug/m <sup>3</sup> /[g/s])	Exposure Location <sup>(1)</sup> (Location of Maximum Risk)	Dispersion Factor (ug/m <sup>3</sup> /[g/s])	Exposure Location <sup>(1)</sup> (Location of Maximum Risk)	Dispersion Factor (ug/m <sup>3</sup> /[g/s])	Exposure Location <sup>(1)</sup> (Location of Maximum Risk)	Dispersion Factor (ug/m <sup>3</sup> /[g/s])	Exposure Location <sup>(1)</sup> (Location of Maximum Risk)	Dispersion Factor (ug/m <sup>3</sup> /[g/s])
HBLR_SCR	2,631	1.319	14,830	2.154	1	0.148	2,631	1.319	14,831	2.496	1	0.148
HBLR_ESP	2,631	0.105	14,830	0.093	1	0.030	2,631	0.105	14,831	0.097	1	0.030
RF12_STK	2,631	3.387	14,830	4.031	1	0.465	2,631	3.387	14,831	4.581	1	0.465
PVUV_STK	2,631	0.815	14,830	0.690	1	0.110	2,631	0.815	14,831	0.725	1	0.110
FORM_STK	2,631	5.560	14,830	6.438	1	0.564	2,631	5.560	14,831	7.936	1	0.564
HEADBOX	2,631	3.565	14,830	5.602	1	0.630	2,631	3.565	14,831	6.325	1	0.630
S_CYC	2,631	6.444	14,830	10.875	1	0.624	2,631	6.444	14,831	12.697	1	0.624
SM_CHP	2,631	37.662	14,830	47.697	1	0.609	2,631	37.662	14,831	52.637	1	0.609
FIRE	2,631	5.753	14,830	9.292	1	0.644	2,631	5.753	14,831	11.108	1	0.644
BGEN	2,631	5.432	14,830	7.766	1	0.645	2,631	5.432	14,831	8.776	1	0.645
EGEN01	2,631	6.028	14,830	8.023	1	0.552	2,631	6.028	14,831	9.624	1	0.552
KILN1_1	2,631	65.919	14,830	34.698	1	0.607	2,631	65.919	14,831	31.934	1	0.607
KILN1_2	2,631	67.653	14,830	35.477	1	0.608	2,631	67.653	14,831	32.578	1	0.608
KILN1_3	2,631	69.316	14,830	36.315	1	0.608	2,631	69.316	14,831	33.270	1	0.608
KILN1_4	2,631	71.041	14,830	37.168	1	0.609	2,631	71.041	14,831	33.968	1	0.609
KILN2_1	2,631	48.121	14,830	29.000	1	0.592	2,631	48.121	14,831	26.929	1	0.592
KILN2_2	2,631	48.922	14,830	29.959	1	0.593	2,631	48.922	14,831	27.761	1	0.593
KILN2_3	2,631	49.600	14,830	30.957	1	0.594	2,631	49.600	14,831	28.623	1	0.594
KILN3_1	2,631	41.485	14,830	29.789	1	0.593	2,631	41.485	14,831	28.023	1	0.593
KILN3_2	2,631	41.667	14,830	30.775	1	0.594	2,631	41.667	14,831	28.914	1	0.594
KILN3_3	2,631	41.704	14,830	31.813	1	0.595	2,631	41.704	14,831	29.848	1	0.595
KILN4_1	2,631	35.546	14,830	30.282	1	0.593	2,631	35.546	14,831	28.928	1	0.593
KILN4_2	2,631	35.380	14,830	31.273	1	0.594	2,631	35.380	14,831	29.866	1	0.594
KILN4_3	2,631	35.106	14,830	32.308	1	0.596	2,631	35.106	14,831	30.847	1	0.596
KILN5_1	2,631	30.302	14,830	30.522	1	0.594	2,631	30.302	14,831	29.721	1	0.594
KILN5_2	2,631	29.948	14,830	31.490	1	0.595	2,631	29.948	14,831	30.697	1	0.595
KILN5_3	2,631	29.529	14,830	32.500	1	0.597	2,631	29.529	14,831	31.723	1	0.597
KILN6_1	2,631	26.077	14,830	30.371	1	0.595	2,631	26.077	14,831	30.236	1	0.595
KILN6_2	2,631	25.713	14,830	31.249	1	0.596	2,631	25.713	14,831	31.192	1	0.596
KILN6_3	2,631	25.294	14,830	32.179	1	0.598	2,631	25.294	14,831	32.217	1	0.598
WHITE	2,631	10.271	14,830	17.413	1	0.641	2,631	10.271	14,831	20.913	1	0.641
MACH	2,631	14.343	14,830	20.715	1	0.644	2,631	14.343	14,831	25.018	1	0.644
RF12_RV	2,631	9.301	14,830	14.473	1	0.648	2,631	9.301	14,831	17.130	1	0.648
HPVUV_FUG	2,631	8.727	14,830	13.866	1	0.645	2,631	8.727	14,831	16.693	1	0.645
FORM_FUG	2,631	15.787	14,830	23.830	1	0.642	2,631	15.787	14,831	29.138	1	0.642
GAS	2,631	43.267	14,830	109.043	1	0.663	2,631	43.267	14,831	174.742	1	0.663
RESIN1	2,631	8.607	14,830	13.173	1	0.647	2,631	8.607	14,831	15.439	1	0.647
RESIN2	2,631	8.655	14,830	13.186	1	0.648	2,631	8.655	14,831	15.453	1	0.648
RESIN3	2,631	8.705	14,830	13.207	1	0.649	2,631	8.705	14,831	15.475	1	0.649
PAINT	2,631	25.180	14,830	39.944	1	0.660	2,631	25.180	14,831	52.529	1	0.660
WELD	2,631	15.237	14,830	21.857	1	0.666	2,631	15.237	14,831	25.877	1	0.666
BPOT	2,631	11.383	14,830	19.925	1	0.613	2,631	11.383	14,831	23.136	1	0.613
SCR_HYDRO	2,631	10.008	14,830	15.492	1	0.650	2,631	10.008	14,831	18.545	1	0.650
HYDRO	2,631	9.986	14,830	14.186	1	0.669	2,631	9.986	14,831	16.542	1	0.669
CLAR	2,631	6.037	14,830	10.898	1	0.766	2,631	6.037	14,831	10.940	1	0.766
PIT	2,631	6.112	14,830	11.072	1	0.763	2,631	6.112	14,831	11.188	1	0.763
LSP	2,631	33.768	14,830	72.692	1	0.638	2,631	33.768	14,831	90.063	1	0.638
S_POND	2,631	7.075	14,830	13.253	1	0.770	2,631	7.075	14,831	13.329	1	0.770
R_POND	2,631	9.397	14,830	20.479	1	0.749	2,631	9.397	14,831	20.185	1	0.749
SURGE	2,631	8.453	14,830	16.874	1	0.753	2,631	8.453	14,831	16.191	1	0.753
ABASE	2,631	7.919	14,830	15.237	1	0.755	2,631	7.919	14,831	15.767	1	0.755
E_POND	2,631	1.725	14,830	2.286	1	0.908	2,631	1.725	14,831	2.314	1	0.908

**References**

<sup>(1)</sup> Exposure location represents the following receptor ID coordinates in the unit emission rate dispersion model with the highest predicted cancer or noncancer risk:

Receptor ID	UTM X (m)	UTM Y (m)	Exposure
1	488,734	5,031,353	Child
2,631	485,405	5,034,912	Residential
7,381	484,205	5,033,487	Acute
14,830	485,468	5,034,785	Worker (Cancer)
14,831	485,455	5,034,769	Worker (Noncancer)

**Table 8-3**  
**Level 3 Risk Assessment Results for Significant TEUs**  
**Stimson Lumber Company Forest Grove Complex—Gaston, Oregon**

Toxic Air Contaminant	CAS	Cancer										Noncancer																
		Residential			Worker			Child			Residential			Worker			Child			Acute								
		Calculated Conc. (a) (ug/m <sup>3</sup> )	RBC (b) (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (a) (ug/m <sup>3</sup> )	RBC (b) (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (a) (ug/m <sup>3</sup> )	RBC (b) (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (a) (ug/m <sup>3</sup> )	RBC (b) (ug/m <sup>3</sup> )	Hazard Index	Calculated Conc. (a) (ug/m <sup>3</sup> )	RBC (b) (ug/m <sup>3</sup> )	Hazard Index	Calculated Conc. (a) (ug/m <sup>3</sup> )	RBC (b) (ug/m <sup>3</sup> )	Hazard Index	Hazard Index (b)								
Exposure Location (a)		2.631			14.830			1			2.631			14.831			1			--								
Cumulative Facility-wide Risk (a)		--	--	24.2	--	--	1.6	--	--	<0.1	--	--	0.8	--	--	0.2	--	--	<0.1	1								
HBLR SCR																												
Cumulative TEU Risk		--	--	0.88	--	--	0.058	--	--	2.1E-03	--	--	0.12	--	--	0.024	--	--	1.4E-03	--								
Dispersion Factor (ug/m <sup>3</sup> /(g/s))		1.32			2.15			0.15			1.32			2.50			0.15			--								
Antimony and compounds	7440-36-0	3.0E-06	(a)	--	4.8E-06	(a)	--	3.3E-07	(a)	--	3.0E-06	0.30	9.9E-06	(a)	5.6E-06	1.30	4.3E-06	(a)	3.3E-07	1.30	2.6E-07	(a)	--					
Arsenic and compounds	7440-38-2	1.6E-05	2.4E-05	0.69	(b)	2.7E-05	6.2E-04	0.043	(b)	1.8E-06	1.3E-03	1.4E-03	(b)	1.6E-05	1.7E-04	0.097	(b)	3.1E-05	2.4E-03	0.013	(b)	1.8E-06	2.4E-03	7.7E-04	(b)	--		
Beryllium and compounds	7440-41-7	1.0E-07	4.2E-04	2.4E-04	(b)	1.7E-07	5.0E-03	3.3E-05	(b)	1.1E-08	0.011	1.0E-06	(b)	1.0E-07	7.0E-03	1.5E-05	(b)	1.9E-07	0.031	6.2E-06	(b)	1.1E-08	0.031	3.7E-07	(b)	--		
Cadmium and compounds	7440-43-9	4.7E-06	5.6E-04	8.5E-03	(b)	7.7E-06	6.7E-03	1.2E-03	(b)	5.3E-07	0.014	3.8E-05	(b)	4.7E-06	5.0E-03	9.5E-04	(b)	9.0E-06	0.037	2.4E-04	(b)	5.3E-07	0.037	1.4E-05	(b)	--		
Chromium VI	18540299p	3.5E-07	3.1E-05	0.011	(b)	5.7E-07	1.0E-03	5.7E-04	(b)	3.9E-08	5.2E-04	7.5E-05	(b)	3.5E-07	0.083	4.2E-06	(b)	6.6E-07	0.88	7.5E-07	(b)	3.9E-08	0.88	4.4E-08	(b)	--		
Cobalt and compounds	7440-48-4	2.9E-06	(a)	--	4.7E-06	(a)	--	3.2E-07	(a)	--	2.9E-06	0.10	2.9E-05	(a)	5.5E-06	0.44	1.2E-05	(a)	3.2E-07	0.44	7.4E-07	(a)	--	--	--	--		
Copper and compounds	7440-50-8	2.7E-05	(a)	--	4.4E-05	(a)	--	3.0E-06	(a)	--	2.7E-05	(a)	--	5.1E-05	(a)	--	3.0E-06	(a)	--	--	--	--	--	--	--	--		
Lead and compounds	7439-92-1	4.4E-05	(a)	--	7.3E-05	(a)	--	5.0E-06	(a)	--	4.4E-05	0.15	3.0E-04	(a)	8.4E-05	0.66	1.3E-04	(a)	5.0E-06	0.66	7.5E-06	(a)	5.0E-06	0.66	7.5E-06	(a)	--	
Manganese and compounds	7439-96-5	3.7E-04	(a)	--	6.1E-04	(a)	--	4.2E-05	(a)	--	3.7E-04	0.090	4.1E-03	(a)	7.0E-04	0.40	1.8E-03	(a)	4.2E-05	0.40	1.0E-04	(a)	4.2E-05	0.40	1.0E-04	(a)	--	
Mercury and compounds	7439-97-6	1.9E-06	(a)	--	3.1E-06	(a)	--	2.2E-07	(a)	--	1.9E-06	0.077	2.5E-05	(a)	3.6E-06	0.43	5.8E-06	(a)	2.2E-07	0.43	3.4E-07	(a)	2.2E-07	0.43	3.4E-07	(a)	--	
Nickel and compounds	7440020in	1.1E-05	(a)	--	1.8E-05	(a)	--	1.2E-06	(a)	--	1.1E-05	0.014	7.8E-04	(a)	2.1E-05	0.062	3.3E-04	(a)	1.2E-06	0.062	2.0E-05	(a)	1.2E-06	0.062	2.0E-05	(a)	--	
Selenium and compounds	7782-49-2	2.5E-06	(a)	--	4.1E-06	(a)	--	2.8E-07	(a)	--	2.5E-06	(a)	--	4.8E-06	(a)	--	2.8E-07	(a)	--	--	--	--	--	--	--	--	--	
Vanadium (fume or dust)	7440-62-2	8.8E-07	(a)	--	1.4E-06	(a)	--	9.9E-08	(a)	--	8.8E-07	0.10	8.8E-06	(a)	1.7E-06	0.44	3.8E-06	(a)	9.9E-08	0.44	2.2E-07	(a)	9.9E-08	0.44	2.2E-07	(a)	--	
Acetaldehyde	75-07-0	1.8E-03	0.45	4.0E-03	(b)	3.0E-03	5.50	5.4E-04	(b)	2.0E-04	12.0	1.7E-05	(b)	1.8E-03	140	1.3E-05	(b)	3.4E-03	620	5.5E-06	(b)	2.0E-04	620	3.3E-07	(b)	--		
Acetone	67-64-1	8.4E-03	(a)	--	0.014	(a)	--	9.4E-04	(a)	--	8.4E-03	31,000	2.7E-07	(a)	0.016	140,000	1.1E-07	(a)	9.4E-04	140,000	6.7E-09	(a)	9.4E-04	140,000	6.7E-09	(a)	--	
Acrolein	107-02-8	2.8E-03	(a)	--	4.5E-03	(a)	--	3.1E-04	(a)	--	2.8E-03	0.35	7.9E-03	(a)	5.2E-03	1.50	3.5E-03	(a)	3.1E-04	1.50	2.1E-04	(a)	3.1E-04	1.50	2.1E-04	(a)	--	
Benzene	71-43-2	2.0E-03	0.13	0.016	(b)	3.3E-03	1.50	2.2E-03	(b)	2.3E-04	3.30	6.9E-05	(b)	2.0E-03	3.00	6.8E-04	(b)	3.9E-03	13.0	3.0E-04	(b)	2.3E-04	13.0	3.0E-04	(b)	1.8E-05	(b)	--
Carbon tetrachloride	56-23-5	1.5E-05	0.17	8.6E-05	(b)	2.4E-05	2.00	1.2E-05	(b)	1.6E-06	4.30	3.8E-07	(b)	1.5E-05	100.0	1.5E-07	(b)	2.8E-05	440	6.3E-08	(b)	1.6E-06	440	3.7E-09	(b)	--		
Chlorine	7782-50-5	1.2E-03	(a)	--	1.9E-03	(a)	--	1.3E-04	(a)	--	1.2E-03	0.15	7.8E-03	(a)	2.2E-03	0.66	3.4E-03	(a)	1.3E-04	0.66	2.0E-04	(a)	1.3E-04	0.66	2.0E-04	(a)	--	
Vinyl acetate	108-05-4	6.3E-06	(a)	--	1.0E-05	(a)	--	7.1E-07	(a)	--	6.3E-06	200	3.2E-08	(a)	1.2E-05	880	1.4E-08	(a)	7.1E-07	880	8.1E-10	(a)	7.1E-07	880	8.1E-10	(a)	--	
Chlorobenzene	108-90-7	2.5E-05	(a)	--	4.0E-05	(a)	--	2.8E-06	(a)	--	2.5E-05	50.0	4.9E-07	(a)	4.7E-05	220	2.1E-07	(a)	2.8E-06	220	1.3E-08	(a)	2.8E-06	220	1.3E-08	(a)	--	
Chloroform	67-66-3	3.0E-05	(a)	--	4.9E-05	(a)	--	3.3E-06	(a)	--	3.0E-05	300	9.9E-08	(a)	5.6E-05	1,300	4.3E-08	(a)	3.3E-06	1,300	2.6E-09	(a)	3.3E-06	1,300	2.6E-09	(a)	--	
1,2-Dichloropropane (Propylene dichloride)	78-87-5	2.5E-05	(a)	--	4.1E-05	(a)	--	2.8E-06	(a)	--	2.5E-05	400	6.2E-06	(a)	4.7E-05	180	2.6E-06	(a)	2.8E-06	180	1.5E-07	(a)	2.8E-06	180	1.5E-07	(a)	--	
Ethyl benzene	100-41-4	1.8E-05	0.40	4.5E-05	(b)	3.0E-05	4.80	6.2E-06	(b)	2.0E-06	10.0	2.0E-07	(b)	1.8E-05	240	7.0E-08	(b)	3.4E-05	1,100	3.1E-08	(b)	2.0E-06	1,100	1.8E-09	(b)	--		
Formaldehyde	50-00-0	2.3E-03	0.17	0.013	(b)	3.7E-03	2.00	1.9E-03	(b)	2.6E-04	4.30	6.0E-05	(b)	2.3E-03	9.00	2.5E-04	(b)	4.3E-03	40.0	1.1E-04	(b)	2.6E-04	40.0	6.4E-06	(b)	--		
Methyl isobutyl ketone (MIBK, Hexone)	108-10-1	1.3E-03	(a)	--	2.0E-03	(a)	--	1.4E-04	(a)	--	1.3E-03	3,000	4.2E-07	(a)	2.4E-03	13,000	1.8E-07	(a)	1.4E-04	13,000	1.4E-04	(a)	1.3E-03	13,000	1.4E-04	(a)	--	
Isopropylbenzene (Cumene)	98-82-8	3.4E-05	(a)	--	5.6E-05	(a)	--	3.9E-06	(a)	--	3.4E-05	400	8.6E-08	(a)	6.5E-05	1,800	3.6E-08	(a)	3.9E-06	1,800	2.1E-09	(a)	3.9E-06	1,800	2.1E-09	(a)	--	
Hexane	110-54-3	4.3E-04	(a)	--	7.0E-04	(a)	--	4.8E-05	(a)	--	4.3E-04	700	6.1E-07	(a)	8.1E-04	3,100	2.6E-07	(a)	4.8E-05	3,100	1.5E-08	(a)	4.8E-05	3,100	1.5E-08	(a)	--	
Isopropyl alcohol	67-63-0	6.7E-03	(a)	--	0.011	(a)	--	7.5E-04	(a)	--	6.7E-03	200	3.4E-05	(a)	0.013	880	1.4E-05	(a)	7.5E-04	880	8.5E-07	(a)	7.5E-04	880	8.5E-07	(a)	--	
Methanol	67-56-1	1.3E-03	(a)	--	2.1E-03	(a)	--	1.5E-04	(a)	--	1.3E-03	4,000	3.3E-07	(a)	2.5E-03	18,000	1.4E-07	(a)	1.5E-04	18,000	8.1E-09	(a)	1.5E-04	18,000	8.1E-09	(a)	--	
Bromomethane (Methyl bromide)	74-83-9	2.7E-05	(a)	--	4.4E-05	(a)	--	3.0E-06	(a)	--	2.7E-05	5.00	5.4E-06	(a)	5.1E-05	220	2.3E-06	(a)	3.0E-06	220	1.4E-07	(a)	3.0E-06	220	1.4E-07	(a)	--	
Chloromethane (Methyl chloride)	74-87-3	1.1E-04	(a)	--	1.7E-04	(a)	--	1.2E-05	(a)	--	1.1E-04	90.0	1.2E-06	(a)	2.0E-04	400	5.0E-07	(a)	1.2E-05	400	3.0E-08	(a)	1.2E-05	400	3.0E-08	(a)	--	
1,1,1-Trichloroethane (Methyl chloroform)	71-55-6	8.6E-05	(a)	--	1.4E-04	(a)	--	9.6E-06	(a)	--	8.6E-05	5,000	1.7E-08	(a)	1.6E-04	22,000	7.4E-09	(a)	9.6E-06	22,000	4.4E-10	(a)	9.6E-06	22,000	4.4E-10	(a)	--	
1,2,4-Trimethyl benzene	95-63-6	1.5E-05	(a)	--	2.4E-05	(a)	--	1.6E-06	(a)	--	1.5E-05	60.0	2.4E-07	(a)	2.7E-05	260	1.1E-07	(a)	1.6E-06	260	6.2E-09	(a)	1.6E-06	260	6.2E-09	(a)	--	
Dichloromethane (Methylene chloride)	75-09-2	7.8E-04	59.0	1.3E-05	(b)	1.3E-03	1,200	1.1E-06	(b)	8.7E-05	620	1.4E-07	(b)	7.8E-04	600	1.3E-06	(b)	1.5E-03	2,600	5.7E-07	(b)	8.7E-05	2,600	3.4E-08	(b)	--		
2-Butanone (Methyl ethyl ketone)	78-93-3	4.8E-04	(a)	--	7.8E-04	(a)	--	5.3E-05	(a)	--	4.8E-04	5,000	9.5E-08	(a)	9.0E-04	22,000	4.1E-08	(a)	5.3E-05	22,000	2.4E-09	(a)	5.3E-05	22,000	2.4E-09	(a)	--	
Phenol	108-95-2	4.6E-03	(a)	--	7.5E-03	(a)	--	5.1E-04	(a)	--	4.6E-03	200	2.3E-05	(a)	8.7E-03	880	9.9E-06	(a)	5.1E-04	880	5.8E-07	(a)	5.1E-04	880	5.8E-07	(a)	--	
Propionaldehyde	123-38-6	1.2E-03	(a)	--	2.0E-03	(a)	--	1.4E-04	(a)	--	1.2E-03	800	1.5E-04	(a)	2.3E-03	35.0	6.7E-05	(a)	1.4E-04	35.0	4.0E-06	(a)	1.4E-04	35.0	4.0E-06	(a)	--	
Styrene	100-42-5	7.2E-04	(a)	--	1.2E-03	(a)	--	8.1E-05	(a)	--	7.2E-04	1,000	7.2E-07	(a)	1.4E-03	4,400	3.1E-											

Toxic Air Contaminant	CAS	Cancer									Noncancer											
		Residential			Worker			Child			Residential			Worker			Child					
		Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Hazard Index	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Hazard Index	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Hazard Index	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Hazard Index
<b>HBLR ESP</b>																						
<b>Cumulative TEU Risk</b>		--	--	<b>0.34</b>	--	--	<b>0.011</b>	--	--	<b>2.6E-03</b>	--	--	<b>0.039</b>	--	--	<b>5.1E-03</b>	--	--	<b>1.6E-03</b>	--		
<b>Dispersion Factor (ug/m<sup>3</sup>/(g/s))</b>		--	<b>0.10</b>	--	<b>0.093</b>	--	--	<b>0.030</b>	--	--	<b>0.10</b>	--	--	<b>0.097</b>	--	--	<b>0.030</b>	--	--	<b>0.030</b>	--	
Antimony and compounds	7440-36-0	5.9E-07	(6)	--	5.3E-07	(7)	--	1.7E-07	(8)	--	5.9E-07	0.30	2.0E-06	(9)	5.5E-07	1.30	4.2E-07	(10)	1.7E-07	1.30	1.3E-07	(11)
Arsenic and compounds	7440-38-2	3.6E-06	2.4E-05	0.15	3.2E-06	6.2E-04	5.2E-03	1.1E-06	1.3E-03	8.2E-04	3.6E-06	1.7E-04	0.021	3.4E-06	2.4E-03	1.4E-03	1.1E-06	2.4E-03	1.1E-06	2.4E-03	4.4E-04	(12)
Beryllium and compounds	7440-41-7	5.5E-08	4.2E-04	1.3E-04	4.9E-08	5.0E-03	9.8E-06	1.6E-08	0.011	1.5E-06	5.5E-08	7.0E-03	7.8E-06	5.1E-08	0.031	1.6E-06	1.6E-08	0.031	1.6E-06	0.031	5.2E-07	(13)
Cadmium and compounds	7440-43-9	6.2E-07	5.6E-04	1.1E-03	5.6E-07	6.7E-03	8.3E-05	1.8E-07	0.014	1.3E-05	6.2E-07	5.0E-03	1.2E-04	5.8E-07	0.037	1.6E-05	1.8E-07	0.037	1.6E-05	0.037	4.9E-06	(14)
Chromium VI	18540299p	5.2E-07	3.1E-05	0.017	4.7E-07	1.0E-03	4.7E-04	1.5E-07	5.2E-04	2.9E-04	5.2E-07	0.083	6.3E-06	4.9E-07	0.88	5.5E-07	1.5E-07	0.88	5.5E-07	0.88	1.7E-07	(15)
Cobalt and compounds	7440-48-4	9.6E-07	(6)	--	8.5E-07	(7)	--	2.8E-07	(8)	--	9.6E-07	0.10	9.6E-06	(9)	8.9E-07	0.44	2.0E-06	(10)	2.8E-07	0.44	6.3E-07	(11)
Copper and compounds	7440-50-8	7.3E-06	(6)	--	6.5E-06	(7)	--	2.1E-06	(8)	--	7.3E-06	(9)	--	6.8E-06	(10)	--	2.1E-06	(11)	--	2.1E-06	(12)	--
Lead and compounds	7439-92-1	1.0E-05	(6)	--	9.0E-06	(7)	--	2.9E-06	(8)	--	1.0E-05	0.15	6.7E-05	(9)	9.3E-06	0.66	1.4E-05	(10)	2.9E-06	0.66	4.4E-06	(11)
Manganese and compounds	7439-96-5	1.8E-04	(6)	--	1.6E-04	(7)	--	5.4E-05	(8)	--	1.8E-04	0.090	2.0E-03	(9)	1.7E-04	0.40	4.3E-04	(10)	5.4E-05	0.40	1.3E-04	(11)
Mercury and compounds	7439-97-6	1.9E-06	(6)	--	1.6E-06	(7)	--	5.4E-07	(8)	--	1.9E-06	0.077	2.4E-05	(9)	1.7E-06	0.63	2.7E-06	(10)	5.4E-07	0.63	8.6E-07	(11)
Nickel and compounds	7440020in	5.4E-06	(6)	--	4.8E-06	(7)	--	1.6E-06	(8)	--	5.4E-06	0.014	3.9E-04	(9)	5.0E-06	0.062	8.1E-05	(10)	1.6E-06	0.062	2.5E-05	(11)
Selenium and compounds	7782-49-2	3.1E-06	(6)	--	2.8E-06	(7)	--	9.1E-07	(8)	--	3.1E-06	(9)	--	2.9E-06	(10)	--	9.1E-07	(11)	--	9.1E-07	(12)	--
Vanadium (fume or dust)	7440-62-2	1.1E-06	(6)	--	1.0E-06	(7)	--	3.3E-07	(8)	--	1.1E-06	0.10	1.1E-05	(9)	1.1E-06	0.44	2.4E-06	(10)	3.3E-07	0.44	7.6E-07	(11)
Acetaldehyde	75-07-0	5.5E-04	0.45	1.2E-03	4.9E-04	5.50	8.8E-05	3.6E-04	12.0	1.3E-05	5.5E-04	140	3.9E-06	5.1E-04	620	8.2E-07	1.6E-04	620	1.6E-04	620	2.6E-07	(12)
Acetone	67-64-1	1.0E-03	(6)	--	9.1E-04	(7)	--	3.0E-04	(8)	--	1.0E-03	31,000	3.3E-08	9.5E-04	140,000	6.8E-09	3.0E-04	140,000	3.0E-04	140,000	2.1E-09	(13)
Acrolein	107-02-8	5.0E-04	(6)	--	4.5E-04	(7)	--	1.5E-04	(8)	--	5.0E-04	0.35	1.4E-03	(9)	4.7E-04	1.50	3.1E-04	(10)	1.5E-04	1.50	9.7E-05	(11)
Benzene	71-43-2	1.9E-03	0.13	0.015	1.7E-03	1.50	1.1E-03	5.5E-04	3.30	1.7E-04	1.9E-03	300	6.3E-04	1.8E-03	130	1.3E-04	5.5E-04	130	1.3E-04	5.5E-04	4.2E-05	(12)
Carbon tetrachloride	56-23-5	1.9E-05	0.17	1.1E-04	1.7E-05	2.00	8.5E-06	5.5E-06	4.30	1.3E-06	1.9E-05	100.0	1.9E-07	1.8E-05	440	4.0E-08	5.5E-06	440	4.0E-08	5.5E-06	1.3E-08	(13)
Chlorine	7782-50-5	1.5E-03	(6)	--	1.4E-03	(7)	--	4.4E-04	(8)	--	1.5E-03	0.15	0.010	(9)	1.4E-03	0.66	2.1E-03	(10)	4.4E-04	0.66	6.7E-04	(11)
Chlorobenzene	108-90-7	3.2E-05	(6)	--	2.9E-05	(7)	--	9.3E-06	(8)	--	3.2E-05	50.0	6.4E-07	(9)	3.0E-05	220	1.4E-07	(10)	9.3E-06	220	4.2E-08	(11)
Chloroform	67-66-3	3.9E-05	(6)	--	3.5E-05	(7)	--	1.1E-05	(8)	--	3.9E-05	300	1.3E-07	(9)	3.6E-05	1,300	2.8E-08	(10)	1.1E-05	1,300	8.7E-09	(11)
1,2-Dichloropropane (Propylene dichloride)	78-87-5	3.2E-05	(6)	--	2.9E-05	(7)	--	9.4E-06	(8)	--	3.2E-05	400	8.1E-06	(9)	3.0E-05	180	1.7E-06	(10)	9.4E-06	180	5.2E-07	(11)
Ethyl benzene	100-41-4	2.4E-05	0.40	5.9E-05	2.1E-05	4.80	4.4E-06	6.8E-06	10.0	6.8E-07	2.4E-05	260	9.0E-08	2.2E-05	1,100	2.0E-08	6.8E-06	1,100	2.0E-08	6.8E-06	6.2E-09	(12)
Formaldehyde	50-00-0	2.0E-03	0.17	0.012	1.8E-03	2.00	9.0E-04	5.9E-04	4.30	1.4E-04	2.0E-03	9.00	2.2E-04	1.9E-03	40.0	4.7E-05	5.9E-04	40.0	4.7E-05	5.9E-04	1.5E-05	(13)
Methyl isobutyl ketone (MIBK, Hexone)	108-10-1	8.6E-04	(6)	--	7.6E-04	(7)	--	2.5E-04	(8)	--	8.6E-04	3,000	2.9E-07	(9)	8.0E-04	13,000	6.1E-08	(10)	7.6E-04	13,000	1.9E-08	(11)
Isopropylbenzene (Cumene)	98-82-8	3.4E-05	(6)	--	3.0E-05	(7)	--	9.9E-06	(8)	--	3.4E-05	400	8.5E-08	(9)	3.2E-05	1,800	1.8E-08	(10)	9.9E-06	1,800	5.5E-09	(11)
Hexane	110-54-3	5.6E-04	(6)	--	4.9E-04	(7)	--	1.6E-04	(8)	--	5.6E-04	700	7.9E-07	(9)	5.2E-04	3,100	1.7E-07	(10)	4.9E-04	3,100	5.2E-08	(11)
Isopropyl alcohol	67-63-0	8.7E-03	(6)	--	7.8E-03	(7)	--	2.5E-03	(8)	--	8.7E-03	200	4.4E-05	(9)	8.1E-03	880	9.2E-06	(10)	7.8E-03	880	2.9E-06	(11)
Methanol	67-56-1	1.4E-03	(6)	--	1.3E-03	(7)	--	4.1E-04	(8)	--	1.4E-03	4,000	3.5E-07	(9)	1.3E-03	18,000	7.3E-08	(10)	1.3E-03	18,000	2.3E-08	(11)
Bromomethane (Methyl bromide)	74-83-9	2.2E-05	(6)	--	1.9E-05	(7)	--	6.3E-06	(8)	--	2.2E-05	5.00	4.4E-06	(9)	2.0E-05	220	9.2E-07	(10)	6.3E-06	220	2.9E-07	(11)
Chloromethane (Methyl chloride)	74-87-3	8.4E-05	(6)	--	7.5E-05	(7)	--	2.4E-05	(8)	--	8.4E-05	90.0	9.3E-07	(9)	7.8E-05	440	1.9E-07	(10)	7.5E-05	440	6.1E-08	(11)
1,1,1-Trichloroethane (Methyl chloroform)	71-55-4	1.1E-04	(6)	--	9.9E-05	(7)	--	3.2E-05	(8)	--	1.1E-04	5,000	2.2E-08	(9)	1.0E-04	22,000	4.7E-09	(10)	9.9E-05	22,000	1.5E-09	(11)
Dichloromethane (Methylene chloride)	75-09-2	7.7E-04	59.0	1.3E-05	6.8E-04	1,200	5.7E-07	2.2E-04	620	3.6E-07	7.7E-04	600	1.3E-06	7.1E-04	2,600	2.7E-07	2.2E-04	2,600	2.7E-07	2.2E-04	6.8E-08	(12)
2-Butanone (Methyl ethyl ketone)	78-93-3	1.3E-05	(6)	--	1.2E-05	(7)	--	3.9E-06	(8)	--	1.3E-05	5,000	2.7E-09	(9)	1.2E-05	22,000	5.7E-10	(10)	3.9E-06	22,000	1.8E-10	(11)
Phenol	108-95-2	3.1E-04	(6)	--	2.7E-04	(7)	--	9.0E-05	(8)	--	3.1E-04	200	1.5E-06	(9)	2.9E-04	880	3.3E-07	(10)	9.0E-05	880	1.0E-07	(11)
Propionaldehyde	123-38-6	6.0E-04	(6)	--	5.3E-04	(7)	--	1.7E-04	(8)	--	6.0E-04	800	7.5E-05	(9)	5.6E-04	350	1.6E-05	(10)	5.3E-04	350	5.0E-06	(11)
Styrene	100-42-5	9.0E-04	(6)	--	8.1E-04	(7)	--	2.6E-04	(8)	--	9.0E-04	1,000	9.0E-07	(9)	8.4E-04	4,400	1.9E-07	(10)	8.1E-04	4,400	6.0E-08	(11)
Toluene	108-88-3	2.2E-05	(6)	--	2.0E-05	(7)	--	6.4E-06	(8)	--	2.2E-05	5,000	4.4E-09	(9)	2.0E-05	22,000	9.3E-10	(10)	2.0E-05	22,000	2.9E-10	(11)
Xylene (mixture)	1330-20-7	1.0E-05	(6)	--	9.0E-06	(7)	--	2.9E-06	(8)	--	1.0E-05	220	4.6E-08	(9)	9.3E-06	970	9.6E-09	(10)	9.0E-06	970	3.0E-09	(11)
Vinyl Chloride	75-01-4	3.5E-05	0.11	3.2E-04	3.2E-05	2.70	1.2E-05	1.0E-05	0.22	4.7E-05	3.5E-05	100.0	3.5E-07	3.3E-05	440	7.5E-08	3.3E-05	440	7.5E-08	3.3E-05	2.3E-08	(12)
Trichloroethene (TCE, Trichloroethylene)	79-01-6	3.8E-05	0.20	1.9E-04	3.4E-05	2.90	1.2E-05	1.1E-05	3.50	3.2E-06	3.8E-05	2.10	1.8E-05	3.6E-05	9.20	3.9E-06	1.1E-05	9.20	3.9E-06	1.1E-05	1.2E-06	(13)
Hydrogen fluoride	7664-39-3	1.7E-04	(6)	--	1.6E-04	(7)	--	5.1E-05	(8)	--	1.7E-04	2.10	8.3E-05	(9)	1.6E-04	19.0	8.5E-06	(10)	1.6E-04	19.0	2.7E-06	(11)
Hydrochloric acid	7647-01-0	1.9E-04	(6)	--	1.7E-04	(7)	--	5.5E-05	(8)	--	1.9E-04	20.0	9.4E-06	(9)	1.8E-04	88.0	2.0E-06	(10)	1.7E-04	88.0	6.3E-07	(11)
Benz[a]anthracene	56-55-3	1.6E-07	2.1E-04	7.5E-04	1.4E-07	0.015	9.3E-06	4.6E-08	7.8E-03	5.8E-06	1.6E-07	(9)	--	1.5E-07	(10)	--	4.6E-08	(11)	--	4.6E-08	(12)	--
Benz[a]pyrene	50-32-8	4.3E-06	4.3E-05	0.099	3.8E-06	3.0E-03	1.3E-03	1.2E-06	1.6E-03	7.8E-04	4.3E-06	2.0E-03	2.1E-03	4.0E-06	8.8E-03	4.5E-04	1.2E-06	8.8E-03				

Toxic Air Contaminant	CAS	Cancer									Noncancer										
		Residential			Worker			Child			Residential			Worker			Child				
		Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Hazard Index	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Hazard Index	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Hazard Index	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )
<b>KILN1_4</b>																					
Cumulative TEU Risk		--	--	0.89	--	--	0.038	--	--	2.9E-04	--	--	0.024	--	--	2.6E-03	--	--	4.7E-05	--	--
Dispersion Factor (ug/m <sup>3</sup> /(g/s))			71.0			37.2			0.61			71.0			34.0			0.61			
Acetaldehyde	75-07-0	0.36	0.45	0.80 (R)	0.19	5.50	0.034 (R)	3.1E-03	12.0	2.6E-04 (R)	0.36	140	2.6E-03 (R)	0.17	620	2.8E-04 (R)	3.1E-03	620	5.0E-06 (R)	--	--
Acrolein	107-02-8	6.4E-03 (R)	--	--	3.4E-03 (R)	--	--	5.5E-05 (R)	--	--	6.4E-03 (R)	0.35	0.018 (R)	3.1E-03 (R)	1.50	2.0E-03 (R)	5.5E-05 (R)	1.50	3.7E-05 (R)	--	--
Formaldehyde	50-00-0	0.016	0.17	0.096 (R)	8.6E-03 (R)	2.00	4.3E-03 (R)	1.4E-04 (R)	4.30	3.3E-05 (R)	0.016	9.00	1.8E-03 (R)	7.8E-03 (R)	40.0	2.0E-04 (R)	1.4E-04 (R)	40.0	3.5E-06 (R)	--	--
Methanol	67-56-1	0.55 (R)	--	--	0.29 (R)	--	--	4.7E-03 (R)	--	--	0.55 (R)	4.000	1.4E-04 (R)	0.26 (R)	18.000	1.5E-05 (R)	4.7E-03 (R)	18.000	2.6E-07 (R)	--	--
Propionaldehyde	123-38-6	6.2E-03 (R)	--	--	3.3E-03 (R)	--	--	5.3E-05 (R)	--	--	6.2E-03 (R)	8.00	7.8E-04 (R)	3.0E-03 (R)	35.0	8.5E-05 (R)	5.3E-05 (R)	35.0	1.5E-06 (R)	--	--
<b>KILN2_1</b>																					
Cumulative TEU Risk		--	--	1.61	--	--	0.080	--	--	7.5E-04	--	--	0.043	--	--	5.5E-03	--	--	1.2E-04	--	--
Dispersion Factor (ug/m <sup>3</sup> /(g/s))			48.1			29.0			0.59			48.1			26.9			0.59			
Acetaldehyde	75-07-0	0.65	0.45	1.44 (R)	0.39	5.50	0.071 (R)	7.9E-03	12.0	6.6E-04 (R)	0.65	140	4.6E-03 (R)	0.36	620	5.8E-04 (R)	7.9E-03	620	1.3E-05 (R)	--	--
Acrolein	107-02-8	0.012 (R)	--	--	0.012 (R)	--	--	1.4E-04 (R)	--	--	0.012 (R)	0.35	0.033 (R)	6.5E-03 (R)	1.50	4.3E-03 (R)	1.4E-04 (R)	1.50	9.5E-05 (R)	--	--
Formaldehyde	50-00-0	0.030	0.17	0.17 (R)	0.018 (R)	2.00	8.9E-03 (R)	3.6E-04 (R)	4.30	8.5E-05 (R)	0.030 (R)	9.00	3.3E-03 (R)	0.017 (R)	40.0	4.1E-04 (R)	3.6E-04 (R)	40.0	9.1E-06 (R)	--	--
Methanol	67-56-1	0.99 (R)	--	--	0.60 (R)	--	--	0.012 (R)	--	--	0.99 (R)	4.000	2.5E-04 (R)	0.55 (R)	18.000	3.1E-05 (R)	0.012 (R)	18.000	6.7E-07 (R)	--	--
Propionaldehyde	123-38-6	0.011 (R)	--	--	6.8E-03 (R)	--	--	1.4E-04 (R)	--	--	0.011 (R)	8.00	1.4E-03 (R)	6.3E-03 (R)	35.0	1.8E-04 (R)	1.4E-04 (R)	35.0	3.9E-06 (R)	--	--
<b>KILN2_2</b>																					
Cumulative TEU Risk		--	--	1.64	--	--	0.082	--	--	7.5E-04	--	--	0.043	--	--	5.7E-03	--	--	1.2E-04	--	--
Dispersion Factor (ug/m <sup>3</sup> /(g/s))			48.9			30.0			0.59			48.9			27.8			0.59			
Acetaldehyde	75-07-0	0.66	0.45	1.46 (R)	0.40	5.50	0.073 (R)	8.0E-03	12.0	6.6E-04 (R)	0.66	140	4.7E-03 (R)	0.37 (R)	620	6.0E-04 (R)	8.0E-03	620	1.3E-05 (R)	--	--
Acrolein	107-02-8	0.012 (R)	--	--	7.2E-03 (R)	--	--	1.4E-04 (R)	--	--	0.012 (R)	0.35	0.034 (R)	6.7E-03 (R)	1.50	4.5E-03 (R)	1.4E-04 (R)	1.50	9.5E-05 (R)	--	--
Formaldehyde	50-00-0	0.030	0.17	0.18 (R)	0.018 (R)	2.00	9.2E-03 (R)	3.6E-04 (R)	4.30	8.5E-05 (R)	0.030 (R)	9.00	3.3E-03 (R)	0.017 (R)	40.0	4.3E-04 (R)	3.6E-04 (R)	40.0	9.1E-06 (R)	--	--
Methanol	67-56-1	1.00 (R)	--	--	0.62 (R)	--	--	0.012 (R)	--	--	1.00 (R)	4.000	2.5E-04 (R)	0.57 (R)	18.000	3.2E-05 (R)	0.012 (R)	18.000	6.8E-07 (R)	--	--
Propionaldehyde	123-38-6	0.011 (R)	--	--	7.0E-03 (R)	--	--	1.4E-04 (R)	--	--	0.011 (R)	8.00	1.4E-03 (R)	6.5E-03 (R)	35.0	1.9E-04 (R)	1.4E-04 (R)	35.0	4.0E-06 (R)	--	--
<b>KILN2_3</b>																					
Cumulative TEU Risk		--	--	1.66	--	--	0.085	--	--	7.5E-04	--	--	0.044	--	--	5.9E-03	--	--	1.2E-04	--	--
Dispersion Factor (ug/m <sup>3</sup> /(g/s))			49.6			31.0			0.59			49.6			28.6			0.59			
Acetaldehyde	75-07-0	0.67	0.45	1.48 (R)	0.42	5.50	0.076 (R)	8.0E-03	12.0	6.7E-04 (R)	0.67	140	4.8E-03 (R)	0.38 (R)	620	6.2E-04 (R)	8.0E-03	620	1.3E-05 (R)	--	--
Acrolein	107-02-8	0.012 (R)	--	--	7.5E-03 (R)	--	--	1.4E-04 (R)	--	--	0.012 (R)	0.35	0.034 (R)	6.9E-03 (R)	1.50	4.6E-03 (R)	1.4E-04 (R)	1.50	9.5E-05 (R)	--	--
Formaldehyde	50-00-0	0.030	0.17	0.18 (R)	0.019 (R)	2.00	9.5E-03 (R)	3.7E-04 (R)	4.30	8.5E-05 (R)	0.030 (R)	9.00	3.4E-03 (R)	0.018 (R)	40.0	4.4E-04 (R)	3.7E-04 (R)	40.0	9.1E-06 (R)	--	--
Methanol	67-56-1	1.02 (R)	--	--	0.64 (R)	--	--	0.012 (R)	--	--	1.02 (R)	4.000	2.5E-04 (R)	0.59 (R)	18.000	3.3E-05 (R)	0.012 (R)	18.000	6.8E-07 (R)	--	--
Propionaldehyde	123-38-6	0.012 (R)	--	--	7.2E-03 (R)	--	--	1.4E-04 (R)	--	--	0.012 (R)	8.00	1.4E-03 (R)	6.7E-03 (R)	35.0	1.9E-04 (R)	1.4E-04 (R)	35.0	4.0E-06 (R)	--	--
<b>KILN3_1</b>																					
Cumulative TEU Risk		--	--	1.39	--	--	0.082	--	--	7.5E-04	--	--	0.037	--	--	5.8E-03	--	--	1.2E-04	--	--
Dispersion Factor (ug/m <sup>3</sup> /(g/s))			41.5			29.8			0.59			41.5			28.0			0.59			
Acetaldehyde	75-07-0	0.56	0.45	1.24 (R)	0.40	5.50	0.073 (R)	8.0E-03	12.0	6.6E-04 (R)	0.56	140	4.0E-03 (R)	0.38 (R)	620	6.1E-04 (R)	8.0E-03	620	1.3E-05 (R)	--	--
Acrolein	107-02-8	0.010 (R)	--	--	7.2E-03 (R)	--	--	1.4E-04 (R)	--	--	0.010 (R)	0.35	0.029 (R)	6.8E-03 (R)	1.50	4.5E-03 (R)	1.4E-04 (R)	1.50	9.5E-05 (R)	--	--
Formaldehyde	50-00-0	0.025	0.17	0.15 (R)	0.018 (R)	2.00	9.2E-03 (R)	3.6E-04 (R)	4.30	8.5E-05 (R)	0.025 (R)	9.00	2.8E-03 (R)	0.017 (R)	40.0	4.3E-04 (R)	3.6E-04 (R)	40.0	9.1E-06 (R)	--	--
Methanol	67-56-1	0.85 (R)	--	--	0.61 (R)	--	--	0.012 (R)	--	--	0.85 (R)	4.000	2.1E-04 (R)	0.58 (R)	18.000	3.2E-05 (R)	0.012 (R)	18.000	6.8E-07 (R)	--	--
Propionaldehyde	123-38-6	9.7E-03 (R)	--	--	7.0E-03 (R)	--	--	1.4E-04 (R)	--	--	9.7E-03 (R)	8.00	1.2E-03 (R)	6.5E-03 (R)	35.0	1.9E-04 (R)	1.4E-04 (R)	35.0	4.0E-06 (R)	--	--
<b>KILN3_2</b>																					
Cumulative TEU Risk		--	--	1.39	--	--	0.085	--	--	7.5E-04	--	--	0.037	--	--	5.9E-03	--	--	1.2E-04	--	--
Dispersion Factor (ug/m <sup>3</sup> /(g/s))			41.7			30.8			0.59			41.7			28.9			0.59			
Acetaldehyde	75-07-0	0.56	0.45	1.24 (R)	0.41	5.50	0.075 (R)	8.0E-03	12.0	6.6E-04 (R)	0.56	140	4.0E-03 (R)	0.39 (R)	620	6.3E-04 (R)	8.0E-03	620	1.3E-05 (R)	--	--
Acrolein	107-02-8	0.010 (R)	--	--	7.4E-03 (R)	--	--	1.4E-04 (R)	--	--	0.010 (R)	0.35	0.029 (R)	7.0E-03 (R)	1.50	4.6E-03 (R)	1.4E-04 (R)	1.50	9.5E-05 (R)	--	--
Formaldehyde	50-00-0	0.026	0.17	0.15 (R)	0.019 (R)	2.00	9.5E-03 (R)	3.6E-04 (R)	4.30	8.5E-05 (R)	0.026 (R)	9.00	2.8E-03 (R)	0.018 (R)	40.0	4.4E-04 (R)	3.6E-04 (R)	40.0	9.1E-06 (R)	--	--
Methanol	67-56-1	0.86 (R)	--	--	0.63 (R)	--	--	0.012 (R)	--	--	0.86 (R)	4.000	2.1E-04 (R)	0.59 (R)	18.000	3.3E-05 (R)	0.012 (R)	18.000	6.8E-07 (R)	--	--
Propionaldehyde	123-38-6	9.7E-03 (R)	--	--	7.2E-03 (R)	--	--	1.4E-04 (R)	--	--	9.7E-03 (R)	8.00	1.2E-03 (R)	6.7E-03 (R)	35.0	1.9E-04 (R)	1.4E-04 (R)	35.0	4.0E-06 (R)	--	--
<b>KILN3_3</b>																					
Cumulative TEU Risk		--	--	1.40	--	--	0.087	--	--	7.5E-04	--	--	0.037	--	--	6.1E-03	--	--	1.2E-04	--	--
Dispersion Factor (ug/m <sup>3</sup> /(g/s))			41.7			31.8			0.60			41.7			29.8			0.60			
Acetaldehyde	75-07-0	0.56	0.45	1.24 (R)	0.43	5.50	0.078 (R)	8.0E-03	12.0	6.7E-04 (R)	0.56	140	4.0E-03 (R)	0.40 (R)	620	6.5E-04 (R)	8.0E-03	620	1.3E-05 (R)	--	--
Acrolein	107-02-8	0.010 (R)	--	--	7.7E-03 (R)	--	--	1.4E-04 (R)	--	--	0.010 (R)	0.35	0.029 (R)	7.2E-03 (R)	1.50	4.8E-03 (R)	1.4E-04 (R)	1.50	9.5E-05 (R)	--	--
Formaldehyde	50-00-0	0.026	0.17	0.15 (R)	0.020 (R)	2.00	9.8E-03 (R)	3.7E-04 (R)	4.30	8.5E-05 (R)	0.026 (R)	9.00	2.8E-03 (R)	0.018 (R)	40.0	4.4E-04 (R)	3.7E-04 (R)	40.0	9.1E-06 (R)	--	--
Methanol	67-56-1	0.86 (R)	--	--	0.65 (R)	--	--	0.012 (R)	--	--	0.86 (R)	4.000	2.1E-04 (R)	0.61 (R)	18.000	3.4E-05 (R)	0.012 (R)	18.000	6.8E-07 (R)	--	--
Propionaldehyde	123-38-6	9.7E-03 (R)	--	--	7.4E-03 (R)	--	--	1.4E-04 (R)	--	--	9.7E-03 (R)	8.00	1.2E-03 (R)	7.0E-03 (R)	35.0	2.0E-04 (R)	1.4E-04 (R)	35.0	4.0E-06 (R)	--	--
<b>KILN4_1</b>																					
Cumulative TEU Risk		--	--	1.19	--	--	0.083	--	--	7.5E-04	--	--	0.032	--	--	5.9E-03	--	--	1.2E-04	--	--
Dispersion Factor (ug/m <sup>3</sup> /(g/s))			35.5			30.3			0.59			35.5			28.9			0.59			
Acetaldehyde	75-07-0	0.48	0.45	1.06 (R)	0.41	5.50	0.074 (R)	8.0E-03	12.0	6.6E-04 (R)	0.48	140	3.4E-03 (R)	0.39 (R)	620	6.3E-04 (R)	8.0E-03	620	1.3E-05 (R)	--	--
Acrolein	107-02-8	8.6E-03 (R)	--	--	7.3E-03 (R)	--	--	1.4E-04 (R)	--	--	8.6E-03 (R)	0.35	0.024 (R)	7.0E-03 (R)	1.50	4.7E-03 (R)	1.4E-04 (R)	1.50	9.5E-05 (R)	--	--
Formaldehyde	50-00-0	0.022	0.17	0.13 (R)	0.019 (R)	2.00	9.3E-03 (R)	3.6E-04 (R)	4.30	8.5E-05 (R)	0.022 (R)										

Toxic Air Contaminant	CAS	Cancer									Noncancer											
		Residential			Worker			Child			Residential			Worker			Child					
		Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Hazard Index	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Hazard Index	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Hazard Index	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Hazard Index
<b>KILN6_1</b>																						
Cumulative TEU Risk		--	--	0.87	--	--	0.084	--	--	7.5E-04	--	--	0.023	--	--	6.2E-03	--	--	1.2E-04	--	--	--
Dispersion Factor (ug/m <sup>3</sup> /[g/s])		--	26.1	--	30.4	--	0.59	--	26.1	--	30.2	--	0.59	--	--	--	--	--	--	--	--	--
Acetaldehyde	75-07-0	0.35	0.45	0.78 (B)	0.41	5.50	0.074 (B)	8.0E-03	12.0	6.7E-04 (B)	0.35	140	2.5E-03 (B)	0.41	620	6.6E-04 (B)	8.0E-03	620	1.3E-05 (B)	--	--	--
Acrolein	107-02-8	6.3E-03 (B)	--	--	7.3E-03 (B)	--	--	1.4E-04 (B)	--	--	6.3E-03	0.35	0.018 (B)	7.3E-03	1.50	4.9E-03 (B)	1.4E-04	1.50	9.6E-05 (B)	--	--	--
Formaldehyde	50-00-0	0.016	0.17	0.094 (B)	0.019	2.00	9.3E-03 (B)	3.7E-04	4.30	8.5E-05 (B)	0.016	9.00	1.8E-03 (B)	0.019	40.0	4.6E-04 (B)	3.7E-04	40.0	9.1E-06 (B)	--	--	--
Methanol	67-56-1	0.54	--	--	0.62	--	--	0.012	--	--	0.54	4.000	1.3E-04 (B)	0.62	18,000	3.4E-05 (B)	0.012	18,000	6.8E-07 (B)	--	--	--
Propionaldehyde	123-38-6	6.1E-03 (B)	--	--	7.1E-03 (B)	--	--	1.4E-04 (B)	--	--	6.1E-03	8.00	7.6E-04 (B)	7.1E-03	35.0	2.0E-04 (B)	1.4E-04	35.0	4.0E-06 (B)	--	--	--
<b>KILN6_2</b>																						
Cumulative TEU Risk		--	--	0.86	--	--	0.086	--	--	7.5E-04	--	--	0.023	--	--	6.4E-03	--	--	1.2E-04	--	--	--
Dispersion Factor (ug/m <sup>3</sup> /[g/s])		--	25.7	--	31.2	--	0.60	--	25.7	--	31.2	--	0.60	--	--	--	--	--	--	--	--	--
Acetaldehyde	75-07-0	0.35	0.45	0.77 (B)	0.42	5.50	0.076 (B)	8.0E-03	12.0	6.7E-04 (B)	0.35	140	2.5E-03 (B)	0.42	620	6.8E-04 (B)	8.0E-03	620	1.3E-05 (B)	--	--	--
Acrolein	107-02-8	6.2E-03 (B)	--	--	7.5E-03 (B)	--	--	1.4E-04 (B)	--	--	6.2E-03	0.35	0.018 (B)	7.5E-03	1.50	5.0E-03 (B)	1.4E-04	1.50	9.6E-05 (B)	--	--	--
Formaldehyde	50-00-0	0.016	0.17	0.093 (B)	0.019	2.00	9.6E-03 (B)	3.7E-04	4.30	8.5E-05 (B)	0.016	9.00	1.8E-03 (B)	0.019	40.0	4.8E-04 (B)	3.7E-04	40.0	9.2E-06 (B)	--	--	--
Methanol	67-56-1	0.53	--	--	0.64	--	--	0.012	--	--	0.53	4,000	1.3E-04 (B)	0.64	18,000	3.6E-05 (B)	0.012	18,000	6.8E-07 (B)	--	--	--
Propionaldehyde	123-38-6	6.0E-03 (B)	--	--	7.3E-03 (B)	--	--	1.4E-04 (B)	--	--	6.0E-03	8.00	7.5E-04 (B)	7.3E-03	35.0	2.1E-04 (B)	1.4E-04	35.0	4.0E-06 (B)	--	--	--
<b>KILN6_3</b>																						
Cumulative TEU Risk		--	--	0.85	--	--	0.088	--	--	7.5E-04	--	--	0.022	--	--	6.6E-03	--	--	1.2E-04	--	--	--
Dispersion Factor (ug/m <sup>3</sup> /[g/s])		--	25.3	--	32.2	--	0.60	--	25.3	--	32.2	--	0.60	--	--	--	--	--	--	--	--	--
Acetaldehyde	75-07-0	0.34	0.45	0.76 (B)	0.43	5.50	0.079 (B)	8.0E-03	12.0	6.7E-04 (B)	0.34	140	2.4E-03 (B)	0.43	620	7.0E-04 (B)	8.0E-03	620	1.3E-05 (B)	--	--	--
Acrolein	107-02-8	6.1E-03 (B)	--	--	7.8E-03 (B)	--	--	1.4E-04 (B)	--	--	6.1E-03	0.35	0.017 (B)	7.8E-03	1.50	5.2E-03 (B)	1.4E-04	1.50	9.6E-05 (B)	--	--	--
Formaldehyde	50-00-0	0.016	0.17	0.091 (B)	0.020	2.00	9.9E-03 (B)	3.7E-04	4.30	8.5E-05 (B)	0.016	9.00	1.7E-03 (B)	0.020	40.0	5.0E-04 (B)	3.7E-04	40.0	9.2E-06 (B)	--	--	--
Methanol	67-56-1	0.52	--	--	0.66	--	--	0.012	--	--	0.52	4,000	1.3E-04 (B)	0.66	18,000	3.7E-05 (B)	0.012	18,000	6.8E-07 (B)	--	--	--
Propionaldehyde	123-38-6	5.9E-03 (B)	--	--	7.5E-03 (B)	--	--	1.4E-04 (B)	--	--	5.9E-03	8.00	7.4E-04 (B)	7.5E-03	35.0	2.1E-04 (B)	1.4E-04	35.0	4.0E-06 (B)	--	--	--
<b>RF12_STK</b>																						
Cumulative TEU Risk		--	--	0.14	--	--	0.014	--	--	7.5E-04	--	--	0.016	--	--	5.1E-03	--	--	5.2E-04	--	--	--
Dispersion Factor (ug/m <sup>3</sup> /[g/s])		--	3.39	--	4.03	--	0.47	--	3.39	--	4.58	--	0.47	--	--	--	--	--	--	--	--	--
Acetaldehyde	75-07-0	0.048	0.45	0.11 (B)	0.058	5.50	0.010 (B)	6.6E-03	12.0	5.5E-04 (B)	0.048	140	3.5E-04 (B)	0.045	620	1.1E-04 (B)	6.6E-03	620	1.1E-05 (B)	--	--	--
Acetone	67-64-1	5.8E-03 (B)	--	--	6.9E-03 (B)	--	--	8.0E-04 (B)	--	--	5.8E-03	31,000	1.9E-07 (B)	7.9E-03	140,000	5.6E-08 (B)	8.0E-04	140,000	5.7E-09 (B)	--	--	--
Acrolein	107-02-8	5.3E-03 (B)	--	--	6.3E-03 (B)	--	--	7.3E-04 (B)	--	--	5.3E-03	0.35	0.015 (B)	7.2E-03	1.50	4.8E-03 (B)	7.3E-04	1.50	4.9E-04 (B)	--	--	--
Formaldehyde	50-00-0	6.2E-03 (B)	0.17	0.036 (B)	7.4E-03 (B)	2.00	3.7E-03 (B)	8.5E-04 (B)	4.30	2.0E-04 (B)	6.2E-03	9.00	6.9E-04 (B)	8.4E-03	40.0	2.1E-04 (B)	8.5E-04	40.0	2.1E-05 (B)	--	--	--
Methyl isobutyl ketone (MIBK, Hexone)	108-10-1	4.3E-04 (B)	--	--	5.2E-04 (B)	--	--	6.0E-05 (B)	--	--	4.3E-04	3,000	1.4E-07 (B)	5.9E-04	13,000	4.5E-08 (B)	6.0E-05	13,000	4.6E-09 (B)	--	--	--
Methanol	67-56-1	5.5E-03 (B)	--	--	6.5E-03 (B)	--	--	7.6E-04 (B)	--	--	5.5E-03	4,000	1.4E-04 (B)	7.4E-03	18,000	4.1E-07 (B)	7.4E-04	18,000	4.2E-08 (B)	--	--	--
2-Butanone (Methyl ethyl ketone)	78-93-3	2.5E-04 (B)	--	--	2.9E-04 (B)	--	--	3.4E-05 (B)	--	--	2.5E-04	5,000	4.9E-08 (B)	3.3E-04	22,000	1.5E-08 (B)	3.4E-05	22,000	1.5E-09 (B)	--	--	--
Propionaldehyde	123-38-6	6.6E-04 (B)	--	--	7.9E-04 (B)	--	--	9.1E-05 (B)	--	--	6.6E-04	8.00	6.3E-05 (B)	9.0E-04	35.0	2.6E-05 (B)	9.1E-05	35.0	2.6E-06 (B)	--	--	--
Styrene	100-42-5	3.2E-04 (B)	--	--	3.8E-04 (B)	--	--	4.4E-05 (B)	--	--	3.2E-04	1,000	3.2E-07 (B)	4.3E-04	4,400	9.8E-08 (B)	4.4E-05	4,400	1.0E-08 (B)	--	--	--
<b>PVUV_STK</b>																						
Cumulative TEU Risk		--	--	0.033	--	--	2.4E-03	--	--	1.8E-04	--	--	5.3E-04	--	--	1.1E-04	--	--	1.6E-05	--	--	--
Dispersion Factor (ug/m <sup>3</sup> /[g/s])		--	0.81	--	0.69	--	0.11	--	0.81	--	0.72	--	0.11	--	--	--	--	--	--	--	--	--
Acetaldehyde	75-07-0	4.0E-03 (B)	0.45	8.9E-03 (B)	3.4E-03 (B)	5.50	6.2E-04 (B)	5.4E-04 (B)	12.0	4.5E-05 (B)	4.0E-03	140	2.9E-05 (B)	3.6E-03	620	5.8E-06 (B)	5.4E-04	620	8.8E-07 (B)	--	--	--
Acetone	67-64-1	4.7E-03 (B)	--	--	4.0E-03 (B)	--	--	6.4E-04 (B)	--	--	4.7E-03	31,000	1.5E-07 (B)	4.2E-03	140,000	3.0E-08 (B)	6.4E-04	140,000	4.6E-09 (B)	--	--	--
Formaldehyde	50-00-0	4.1E-03 (B)	0.17	0.024 (B)	3.5E-03 (B)	2.00	1.8E-03 (B)	5.6E-04 (B)	4.30	1.3E-04 (B)	4.1E-03	9.00	4.6E-04 (B)	3.7E-03	40.0	9.2E-05 (B)	5.6E-04	40.0	1.4E-05 (B)	--	--	--
Methanol	67-56-1	0.18	--	--	0.15	--	--	0.025 (B)	--	--	0.18	4,000	4.6E-05 (B)	0.16	18,000	9.0E-06 (B)	0.025	18,000	1.4E-06 (B)	--	--	--
<b>FORM_STK</b>																						
Cumulative TEU Risk		--	--	0.095	--	--	9.2E-03	--	--	3.7E-04	--	--	6.1E-03	--	--	2.0E-03	--	--	1.4E-04	--	--	--
Dispersion Factor (ug/m <sup>3</sup> /[g/s])		--	5.56	--	6.44	--	0.56	--	5.56	--	7.94	--	0.56	--	--	--	--	--	--	--	--	--
Acetaldehyde	75-07-0	0.021	0.45	0.046 (B)	0.024	5.50	4.4E-03 (B)	2.1E-03 (B)	12.0	1.8E-04 (B)	0.021	140	1.5E-04 (B)	0.030	620	4.8E-05 (B)	2.1E-03	620	3.4E-06 (B)	--	--	--
Acetone	67-64-1	9.2E-03 (B)	--	--	0.011 (B)	--	--	9.2E-03 (B)	--	--	9.2E-03	31,000	3.0E-07 (B)	0.013	140,000	9.4E-08 (B)	9.3E-04	140,000	6.7E-09 (B)	--	--	--
Acrolein	107-02-8	1.8E-03 (B)	--	--	2.1E-03 (B)	--	--	1.8E-04 (B)	--	--	1.8E-03	0.35	5.1E-03 (B)	2.5E-03	1.50	1.7E-03 (B)	1.8E-04	1.50	1.2E-04 (B)	--	--	--
Formaldehyde	50-00-0	8.3E-03 (B)	0.17	0.049 (B)	9.6E-03 (B)	2.00	4.8E-03 (B)	8.4E-04 (B)	4.30	2.0E-04 (B)	8.3E-03	9.00	9.2E-04 (B)	0.012	40.0	3.0E-04 (B)	8.4E-04	40.0	2.1E-05 (B)	--	--	--
Methyl isobutyl ketone (MIBK, Hexone)	108-10-1	6.6E-04 (B)	--	--	7.6E-04 (B)	--	--	6.7E-05 (B)	--	--	6.6E-04	3,000	2.2E-07 (B)	9.4E-04	13,000	7.2E-08 (B)	6.7E-05	13,000	5.1E-09 (B)	--	--	--
Methanol	67-56-1	0.047	--	--	0.055 (B)	--	--	4.8E-03 (B)	--	--	0.047	4,000	1.2E-05 (B)	0.067	18,000	3.7E-06 (B)	4.8E-03	18,000	2.7E-07 (B)	--	--	--
2-Butanone (Methyl ethyl ketone)	78-93-3	1.3E-03 (B)	--	--	1.5E-03 (B)	--	--	1.3E-04 (B)	--	--	1.3E-03	5,000	2.6E-07 (B)	1.8E-03	22,000	8.4E-08 (B)	1.3E-04	22,000	6.0E-09 (B)	--	--	--
Toluene	108-88-3	1.3E-03 (B)	--	--	1.5E-03 (B)	--	--	1.3E-04 (B)	--	--	1.3E-03	5,000	2.6E-07 (B)	1.9E-03	22,000	8.5E-08 (B)	1.3E-04	22,000	6.0E-09 (B)	--	--	--
<b>HEADBOX</b>																						
Cumulative TEU Risk		--	--	0.012	--	--	1.6E-03	--	--	8.1E-05	--	--	1.2E-04	--	--	4.7E-05	--	--	4.7E-06	--	--	--
Dispersion Factor (ug/m <sup>3</sup> /[g/s])		--	3.56	--	5.60	--	0.63	--	3.56	--	6.32	--	0.63	--	--	--	--	--	--	--	--	--
Acetaldehyde	75-07-0	3.6E-03 (B)	0.45	8.1E-03 (B)	5.7E-03 (B)	5.50	1.0E-03 (B)	6.4E-04 (B)	12.0	5.4E-05 (B)	3.6E-03	140	2.6E-05 (B)	6.5E-03	620	1.0E-05 (B)	6.4E-04	620	1.0E-06 (B)	--	--	--
Acetone	67-64-1	9.6E-03 (B)	--	--																		

Toxic Air Contaminant	CAS	Cancer									Noncancer												
		Residential			Worker			Child			Residential			Worker			Child			Acute			
		Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Hazard Index	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Hazard Index	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Hazard Index	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Hazard Index	Hazard Index (3)
<b>BGEN</b>																							
Cumulative TEU Risk		--	--	0.32	--	--	0.011	--	--	1.1E-03	--	--	3.9E-03	--	--	6.6E-04	--	--	4.9E-05	--	--	--	
Dispersion Factor (ug/m <sup>3</sup> /(g/s))			5.43			7.77				0.65			5.43			8.78			0.65				
Antimony and compounds	7440-36-0	1.0E-07	(6)	--	1.5E-07	(7)	--	1.2E-08	(8)	--	1.0E-07	0.30	3.4E-07	(9)	1.6E-07	1.30	1.3E-07	(10)	1.2E-08	1.30	9.3E-09	(11)	--
Arsenic and compounds	7440-38-2	5.1E-07	2.4E-05	0.021	7.3E-07	6.2E-04	1.2E-03	6.1E-08	1.3E-03	4.7E-05	5.1E-07	1.7E-04	3.0E-03	8.2E-07	2.4E-03	3.4E-04	6.1E-08	2.4E-03	2.5E-05	6.1E-08	2.4E-03	2.5E-05	(12)
Barium and compounds	7440-39-3	1.2E-07	(6)	--	1.7E-07	(7)	--	1.4E-08	(8)	--	1.2E-07	(9)	--	1.9E-07	(10)	--	1.4E-08	(11)	--	1.4E-08	(12)	--	--
Beryllium and compounds	7440-41-7	1.5E-09	4.2E-04	3.6E-06	2.2E-09	5.0E-03	4.4E-07	1.8E-10	0.011	1.6E-08	1.5E-09	7.0E-03	2.2E-07	2.5E-09	0.031	7.9E-08	1.8E-10	0.031	5.8E-09	1.8E-10	0.031	5.8E-09	(13)
Cadmium and compounds	7440-43-9	4.8E-07	5.6E-04	8.5E-04	6.8E-07	6.7E-03	1.0E-04	5.7E-08	0.014	4.1E-06	4.8E-07	5.0E-03	9.4E-05	7.7E-07	0.037	2.1E-05	5.7E-08	0.037	1.5E-06	5.7E-08	0.037	1.5E-06	(14)
Chromium VI	18540299p	3.2E-08	3.1E-05	1.0E-03	4.6E-08	1.0E-03	4.6E-05	3.8E-09	5.2E-04	7.3E-06	3.2E-08	0.083	3.8E-07	5.2E-08	0.88	5.9E-08	3.8E-09	0.88	4.3E-09	3.8E-09	0.88	4.3E-09	(15)
Cobalt and compounds	7440-48-4	5.0E-09	(6)	--	7.2E-09	(7)	--	6.0E-10	(8)	--	5.0E-09	0.10	5.0E-08	8.1E-09	0.44	1.8E-08	6.0E-10	0.44	1.4E-09	6.0E-10	0.44	1.4E-09	(16)
Copper and compounds	7440-50-8	1.3E-06	(6)	--	1.9E-06	(7)	--	1.6E-07	(8)	--	1.3E-06	(9)	--	2.1E-06	(10)	--	1.6E-07	(11)	--	1.6E-07	(12)	--	--
Lead and compounds	7439-92-1	2.6E-06	(6)	--	3.8E-06	(7)	--	3.1E-07	(8)	--	2.6E-06	0.15	1.8E-05	4.3E-06	0.66	6.5E-06	3.1E-07	0.66	4.8E-07	3.1E-07	0.66	4.8E-07	(17)
Phosphorus and compounds	504	2.7E-06	(6)	--	3.8E-06	(7)	--	3.2E-07	(8)	--	2.7E-06	(9)	--	4.3E-06	(10)	--	3.2E-07	(11)	--	3.2E-07	(12)	--	--
Manganese and compounds	7439-96-5	9.9E-07	(6)	--	1.4E-06	(7)	--	1.2E-07	(8)	--	9.9E-07	0.090	1.1E-05	1.6E-06	0.40	4.0E-06	1.2E-07	0.40	2.9E-07	1.2E-07	0.40	2.9E-07	(18)
Mercury and compounds	7439-97-6	6.4E-07	(6)	--	9.1E-07	(7)	--	7.6E-08	(8)	--	6.4E-07	0.077	8.3E-06	1.0E-06	0.63	1.6E-06	7.6E-08	0.63	1.2E-07	7.6E-08	0.63	1.2E-07	(19)
Nickel and compounds	7440020in	1.2E-06	(6)	--	1.8E-06	(7)	--	1.5E-07	(8)	--	1.2E-06	0.014	8.9E-05	2.0E-06	0.062	3.2E-05	1.5E-07	0.062	2.4E-06	1.5E-07	0.062	2.4E-06	(20)
Selenium and compounds	7782-49-2	7.0E-07	(6)	--	1.0E-06	(7)	--	8.3E-08	(8)	--	7.0E-07	(9)	--	1.1E-06	(10)	--	8.3E-08	(11)	--	8.3E-08	(12)	--	--
Silver and compounds	7440-22-4	1.5E-08	(6)	--	2.2E-08	(7)	--	1.8E-09	(8)	--	1.5E-08	(9)	--	2.5E-08	(10)	--	1.8E-09	(11)	--	1.8E-09	(12)	--	--
Thallium and compounds	7440-28-0	7.7E-08	(6)	--	1.1E-07	(7)	--	9.1E-09	(8)	--	7.7E-08	(9)	--	1.2E-07	(10)	--	9.1E-09	(11)	--	9.1E-09	(12)	--	--
Zinc and compounds	7440-66-6	1.7E-06	(6)	--	2.4E-06	(7)	--	2.0E-07	(8)	--	1.7E-06	(9)	--	2.7E-06	(10)	--	2.0E-07	(11)	--	2.0E-07	(12)	--	--
Acetaldehyde	75-07-0	2.5E-04	0.45	5.6E-04	3.6E-04	5.50	6.5E-05	3.0E-05	12.0	2.5E-06	2.5E-04	140	1.8E-06	4.0E-04	620	6.5E-07	3.0E-05	620	4.8E-08	3.0E-05	620	4.8E-08	(21)
Acrolein	107-02-8	1.1E-05	(6)	--	1.5E-05	(7)	--	1.3E-06	(8)	--	1.1E-05	0.35	3.1E-05	1.7E-05	1.50	1.2E-05	1.3E-06	1.50	8.6E-07	1.3E-06	1.50	8.6E-07	(22)
Ammonia	7664-41-7	9.3E-04	(6)	--	1.3E-03	(7)	--	1.1E-04	(8)	--	9.3E-04	500	1.9E-06	1.5E-03	2.200	6.8E-07	1.1E-04	2.200	5.0E-08	1.1E-04	2.200	5.0E-08	(23)
Benzene	71-43-2	5.9E-05	0.13	4.6E-04	8.5E-05	1.50	5.7E-05	7.1E-06	3.30	2.1E-06	5.9E-05	3.00	2.0E-05	9.6E-05	1.30	7.4E-06	7.1E-06	1.30	5.4E-07	7.1E-06	1.30	5.4E-07	(24)
Chlorobenzene	108-90-7	6.4E-08	(6)	--	9.1E-08	(7)	--	7.6E-09	(8)	--	6.4E-08	50.0	1.3E-09	1.0E-07	220	4.7E-10	7.6E-09	220	3.4E-11	7.6E-09	220	3.4E-11	(25)
Ethyl benzene	100-41-4	3.5E-06	0.40	8.7E-06	5.0E-06	4.80	1.0E-06	4.1E-07	10.0	4.1E-08	3.5E-06	260	1.3E-08	5.6E-06	1.100	5.1E-09	4.1E-07	1.100	3.8E-10	4.1E-07	1.100	3.8E-10	(26)
Formaldehyde	50-00-0	5.5E-04	0.17	3.2E-03	7.9E-04	2.00	3.9E-04	6.5E-05	4.30	1.5E-05	5.5E-04	9.00	6.1E-05	8.9E-04	40.0	2.2E-05	6.5E-05	40.0	1.6E-06	6.5E-05	40.0	1.6E-06	(27)
Hexane	110-54-3	8.6E-06	(6)	--	1.2E-05	(7)	--	1.0E-06	(8)	--	8.6E-06	700	1.2E-08	1.4E-05	3.100	4.5E-09	1.0E-06	3.100	3.3E-10	1.0E-06	3.100	3.3E-10	(28)
1,3-Butadiene	106-99-0	6.9E-05	0.033	2.1E-03	9.9E-05	0.40	2.5E-04	8.2E-06	0.86	9.6E-06	6.9E-05	2.00	3.5E-05	1.1E-04	8.80	1.3E-05	8.2E-06	8.80	9.4E-07	1.3E-05	8.80	9.4E-07	(29)
Propylene	115-07-1	1.5E-04	(6)	--	2.1E-04	(7)	--	1.8E-05	(8)	--	1.5E-04	3.000	5.0E-08	2.4E-04	13.000	1.9E-08	1.8E-05	13.000	1.4E-09	1.9E-08	13.000	1.4E-09	(30)
Toluene	108-88-3	3.4E-05	(6)	--	4.8E-05	(7)	--	4.0E-06	(8)	--	3.4E-05	5.000	6.7E-09	5.4E-05	22.000	2.5E-09	4.0E-06	22.000	1.8E-10	4.0E-06	22.000	1.8E-10	(31)
Xylene (mixture)	1330-20-7	1.4E-05	(6)	--	1.9E-05	(7)	--	1.6E-06	(8)	--	1.4E-05	220	6.1E-08	2.2E-05	970	2.3E-08	1.6E-06	970	1.7E-09	2.3E-08	970	1.7E-09	(32)
Hydrochloric acid	7647-01-0	5.9E-05	(6)	--	8.5E-05	(7)	--	7.1E-06	(8)	--	5.9E-05	20.0	3.0E-06	9.6E-05	880.0	1.1E-06	7.1E-06	880.0	8.0E-08	1.1E-06	880.0	8.0E-08	(33)
DPM	200	2.6E-03	0.10	0.026	3.8E-03	1.20	3.1E-03	3.1E-04	2.60	1.2E-04	2.6E-03	5.00	5.3E-04	4.2E-03	22.0	1.9E-04	3.1E-04	22.0	1.4E-05	3.1E-04	22.0	1.4E-05	(34)
PAHs (excluding Naphthalene)	401	1.2E-05	4.3E-05	2.2E-04	1.7E-05	3.0E-03	5.5E-03	1.4E-06	1.6E-03	8.6E-04	1.2E-05	(9)	--	1.9E-05	(10)	--	1.4E-06	(11)	--	1.4E-06	(12)	--	--
Benzo[a]pyrene	50-32-8	1.1E-08	4.3E-05	2.2E-04	1.6E-08	3.0E-03	5.4E-06	1.3E-09	1.6E-03	8.3E-07	1.1E-08	2.0E-03	5.6E-06	1.8E-08	8.8E-03	2.1E-06	1.3E-09	8.8E-03	1.5E-07	1.3E-09	8.8E-03	1.5E-07	(13)
Naphthalene	91-20-3	6.3E-06	0.029	2.6E-04	9.0E-06	0.35	2.6E-05	7.5E-07	0.76	9.8E-07	6.3E-06	3.70	1.0E-05	1.6E-06	16.0	6.3E-07	7.5E-07	16.0	4.7E-08	6.3E-07	16.0	4.7E-08	(14)
<b>EGEN01</b>																							
Cumulative TEU Risk		--	--	0.16	--	--	7.7E-03	--	--	4.5E-04	--	--	2.2E-03	--	--	5.0E-04	--	--	2.9E-05	--	--	--	
Dispersion Factor (ug/m <sup>3</sup> /(g/s))			6.03			8.02			0.55		6.03			9.62			0.55						
Antimony and compounds	7440-36-0	4.1E-08	(6)	--	5.5E-08	(7)	--	3.8E-09	(8)	--	4.1E-08	0.30	1.4E-07	6.6E-08	1.30	5.0E-08	3.8E-09	1.30	2.9E-09	3.8E-09	1.30	2.9E-09	(15)
Arsenic and compounds	7440-38-2	2.1E-07	2.4E-05	8.6E-03	2.8E-07	6.2E-04	4.4E-04	1.9E-08	1.3E-03	1.5E-05	2.1E-07	1.7E-04	1.2E-03	3.3E-07	2.4E-03	1.4E-04	1.9E-08	2.4E-03	7.9E-06	1.9E-08	2.4E-03	7.9E-06	(16)
Barium and compounds	7440-39-3	4.8E-08	(6)	--	6.4E-08	(7)	--	4.4E-09	(8)	--	4.8E-08	(9)	--	7.7E-08	(10)	--	4.4E-09	(11)	--	4.4E-09	(12)	--	--
Beryllium and compounds	7440-41-7	6.2E-10	4.2E-04	1.5E-06	8.2E-10	5.0E-03	1.6E-07	5.6E-11	0.011	5.1E-09	6.2E-10	7.0E-03	8.8E-08	9.8E-10	0.031	3.2E-08	5.6E-11	0.031	1.8E-09	6.2E-10	0.031	1.8E-09	(17)
Cadmium and compounds	7440-43-9	1.9E-07	5.6E-04	3.5E-04	2.6E-07	6.7E-03	3.8E-05	1.8E-08	0.014	1.3E-06	1.9E-07	5.0E-03	3.9E-05	3.1E-07	0.037	8.4E-06	1.8E-08	0.037	4.8E-07	1.8E-08	0.037	4.8E-07	(18)
Chromium VI	18540299p	1.3E-08	3.1E-05	4.2E-04	1.7E-08	1.0E-03	1.7E-05	1.2E-09	5.2E-04	2.3E-06	1.3E-08	0.083	1.6E-07	2.1E-08	0.88	2.3E-08	1.2E-09	0.88	1.3E-09	1.2E-09	0.88	1.3E-09	(19)
Cobalt and compounds	7440-48-4	2.0E-09	(6)	--	2.7E-09	(7)	--	1.9E-10	(8)	--	2.0E-09	0.10	2.0E-08	3.2E-09	0.44	7.4E-09	1.9E-10	0.44	4.2E-10	1.9E-10	0.44	4.2E-10	(20)
Copper and compounds	7440-50-8	5.3E-07	(6)																				

Toxic Air Contaminant	CAS	Cancer									Noncancer										
		Residential			Worker			Child			Residential			Worker			Child			Acute	
		Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Hazard Index	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Hazard Index	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )	Hazard Index	Calculated Conc. (ug/m <sup>3</sup> )	RBC (2) (ug/m <sup>3</sup> )
<b>FORM_FUG</b>																					
Cumulative TEU Risk		--	--	0.027	--	--	3.4E-03	--	--	4.2E-05	--	--	1.7E-03	--	--	7.5E-04	--	--	1.6E-05	--	--
Dispersion Factor (ug/m <sup>3</sup> /(g/s))		15.8			23.8			0.64			15.8			29.1			0.64			--	--
Acetaldehyde	75-07-0	5.9E-03	0.45	0.013 (B)	8.9E-03	5.50	1.6E-03 (B)	2.4E-04	12.0	2.0E-05 (B)	5.9E-03	140	4.2E-05 (B)	0.011	620	1.8E-05 (B)	2.4E-04	620	3.9E-07 (B)	--	--
Acetone	67-64-1	2.6E-03	(B)	--	3.9E-03	(F)	--	1.1E-04	(B)	--	2.6E-03	31,000	8.4E-08 (B)	4.8E-03	140,000	3.4E-08 (B)	1.1E-04	140,000	7.6E-10 (B)	--	--
Acrolein	107-02-8	5.0E-04	(B)	--	7.6E-04	(F)	--	2.0E-05	(B)	--	5.0E-04	0.35	1.4E-03 (B)	9.3E-04	1.50	6.2E-04 (B)	2.0E-05	1.50	1.4E-05 (B)	--	--
Formaldehyde	50-00-0	2.3E-03	0.17	0.014 (B)	3.5E-03	2.00	1.8E-03 (B)	9.6E-05	4.30	2.2E-05 (B)	2.3E-03	9.00	2.6E-04 (B)	4.3E-03	40.0	1.1E-04 (B)	9.6E-05	40.0	2.4E-06 (B)	--	--
Methyl isobutyl ketone (MIBK, Hexone)	108-10-1	1.9E-04	(B)	--	2.8E-04	(F)	--	7.6E-06	(B)	--	1.9E-04	3,000	6.2E-08 (B)	3.5E-04	13,000	2.7E-08 (B)	7.6E-06	13,000	5.9E-10 (B)	--	--
Methanol	67-56-1	0.013	(B)	--	0.020	(F)	--	5.5E-04	(B)	--	0.013	4,000	3.4E-06 (B)	0.025	18,000	1.4E-06 (B)	5.5E-04	18,000	3.0E-08 (B)	--	--
2-Butanone (Methyl ethyl ketone)	78-93-3	3.7E-04	(B)	--	5.5E-04	(F)	--	1.5E-05	(B)	--	3.7E-04	5,000	7.3E-08 (B)	6.8E-04	22,000	3.1E-08 (B)	1.5E-05	22,000	6.8E-10 (B)	--	--
Toluene	108-88-3	3.7E-04	(B)	--	5.6E-04	(F)	--	1.5E-05	(B)	--	3.7E-04	5,000	7.4E-08 (B)	6.8E-04	22,000	3.1E-08 (B)	1.5E-05	22,000	6.8E-10 (B)	--	--
<b>GAS</b>																					
Cumulative TEU Risk		--	--	0.018	--	--	3.8E-03	--	--	1.1E-05	--	--	7.6E-04	--	--	7.0E-04	--	--	2.7E-06	--	--
Dispersion Factor (ug/m <sup>3</sup> /(g/s))		43.3			109			0.66			43.3			175			0.66			--	--
Benzene	71-43-2	2.3E-03	0.13	0.017 (B)	5.7E-03	1.50	3.8E-03 (B)	3.4E-05	3.30	1.0E-05 (B)	2.3E-03	3.00	7.5E-04 (B)	9.1E-03	13.0	7.0E-04 (B)	3.4E-05	13.0	2.7E-06 (B)	--	--
Ethyl benzene	100-41-4	9.9E-05	0.40	2.5E-04 (B)	2.5E-04	4.80	5.2E-05 (B)	1.5E-06	10.0	1.5E-07 (B)	9.9E-05	260	3.8E-07 (B)	4.0E-04	1,100	3.7E-07 (B)	1.5E-06	1,100	1.4E-09 (B)	--	--
Isopropylbenzene (Cumene)	98-82-8	5.2E-06	(B)	--	1.3E-05	(F)	--	8.0E-08	(B)	--	5.2E-06	400	1.3E-08 (B)	2.1E-05	1,800	1.2E-08 (B)	8.0E-08	1,800	4.4E-11 (B)	--	--
1,3,5-Trimethylbenzene	108-67-8	3.1E-05	(B)	--	7.8E-05	(F)	--	4.7E-07	(B)	--	3.1E-05	60.0	5.1E-07 (B)	1.2E-04	260	4.8E-07 (B)	4.7E-07	260	1.8E-09 (B)	--	--
1,2,3-Trimethylbenzene	526-73-8	1.8E-05	(B)	--	4.5E-05	(F)	--	2.8E-07	(B)	--	1.8E-05	60.0	3.0E-07 (B)	7.3E-05	260	2.8E-07 (B)	2.8E-07	260	1.1E-09 (B)	--	--
Cyclohexane	110-82-7	3.7E-03	(B)	--	9.4E-03	(F)	--	5.7E-05	(B)	--	3.7E-03	6,000	6.2E-07 (B)	0.015	26,000	5.8E-07 (B)	5.7E-05	26,000	2.2E-09 (B)	--	--
1,2,4-Trimethyl benzene	95-63-6	6.7E-05	(B)	--	1.7E-04	(F)	--	1.0E-06	(B)	--	6.7E-05	60.0	1.1E-06 (B)	2.7E-04	260	1.0E-06 (B)	1.0E-06	260	4.0E-09 (B)	--	--
Styrene	100-42-5	2.9E-07	(B)	--	7.2E-07	(F)	--	4.4E-09	(B)	--	2.9E-07	1,000	2.9E-10 (B)	1.2E-06	4,400	2.6E-10 (B)	4.4E-09	4,400	9.9E-13 (B)	--	--
Toluene	108-88-3	1.6E-03	(B)	--	4.0E-03	(F)	--	2.4E-05	(B)	--	1.6E-03	5,000	3.2E-07 (B)	6.4E-03	22,000	2.9E-07 (B)	2.4E-05	22,000	1.1E-09 (B)	--	--
p-Xylene	106-42-3	2.8E-04	(B)	--	7.0E-04	(F)	--	4.2E-06	(B)	--	2.8E-04	200	1.4E-06 (B)	1.1E-03	880	1.3E-06 (B)	4.2E-06	880	4.8E-09 (B)	--	--
o-Xylene	95-47-6	1.0E-04	(B)	--	2.6E-04	(F)	--	1.6E-06	(B)	--	1.0E-04	200	5.1E-07 (B)	4.1E-04	880	4.7E-07 (B)	1.6E-06	880	1.8E-09 (B)	--	--
Naphthalene	91-20-3	1.6E-06	0.029	5.7E-05 (B)	4.1E-06	0.35	1.2E-05 (B)	2.5E-08	0.76	3.3E-08 (B)	1.6E-06	3.70	4.4E-07 (B)	6.6E-06	16.0	4.2E-07 (B)	2.5E-08	16.0	1.6E-09 (B)	--	--
<b>RESIN1</b>																					
Cumulative TEU Risk		--	--	5.8E-03	--	--	7.5E-04	--	--	1.7E-05	--	--	1.1E-04	--	--	4.4E-05	--	--	1.9E-06	--	--
Dispersion Factor (ug/m <sup>3</sup> /(g/s))		8.61			13.2			0.65			8.61			15.4			0.65			--	--
Formaldehyde	50-00-0	9.8E-04	0.17	5.8E-03 (B)	1.5E-03	2.00	7.5E-04 (B)	7.4E-05	4.30	1.7E-05 (B)	9.8E-04	9.00	1.1E-04 (B)	1.8E-03	40.0	4.4E-05 (B)	7.4E-05	40.0	1.8E-06 (B)	--	--
Methanol	67-56-1	3.6E-04	(B)	--	5.4E-04	(F)	--	2.7E-05	(B)	--	3.6E-04	4,000	8.9E-08 (B)	6.4E-04	18,000	3.5E-08 (B)	2.7E-05	18,000	1.5E-09 (B)	--	--
Phenol	108-95-2	2.0E-07	(B)	--	3.1E-07	(F)	--	1.5E-08	(B)	--	2.0E-07	200	1.0E-09 (B)	3.6E-07	880	4.1E-10 (B)	1.5E-08	880	1.7E-11 (B)	--	--
<b>RESIN2</b>																					
Cumulative TEU Risk		--	--	5.0E-03	--	--	6.5E-04	--	--	1.5E-05	--	--	9.4E-05	--	--	3.8E-05	--	--	1.6E-06	--	--
Dispersion Factor (ug/m <sup>3</sup> /(g/s))		8.66			13.2			0.65			8.66			15.5			0.65			--	--
Formaldehyde	50-00-0	8.5E-04	0.17	5.0E-03 (B)	1.3E-03	2.00	6.5E-04 (B)	6.4E-05	4.30	1.5E-05 (B)	8.5E-04	9.00	9.4E-05 (B)	1.5E-03	40.0	3.8E-05 (B)	6.4E-05	40.0	1.6E-06 (B)	--	--
Methanol	67-56-1	3.1E-04	(B)	--	4.7E-04	(F)	--	2.3E-05	(B)	--	3.1E-04	4,000	7.7E-08 (B)	5.5E-04	18,000	3.0E-08 (B)	2.3E-05	18,000	1.3E-09 (B)	--	--
Phenol	108-95-2	1.7E-07	(B)	--	2.6E-07	(F)	--	1.3E-08	(B)	--	1.7E-07	200	8.7E-10 (B)	3.1E-07	880	3.5E-10 (B)	1.3E-08	880	1.5E-11 (B)	--	--
<b>RESIN3</b>																					
Cumulative TEU Risk		--	--	6.1E-03	--	--	7.9E-04	--	--	1.8E-05	--	--	1.2E-04	--	--	4.6E-05	--	--	1.9E-06	--	--
Dispersion Factor (ug/m <sup>3</sup> /(g/s))		8.70			13.2			0.65			8.70			15.5			0.65			--	--
Formaldehyde	50-00-0	1.0E-03	0.17	6.1E-03 (B)	1.6E-03	2.00	7.9E-04 (B)	7.7E-05	4.30	1.8E-05 (B)	1.0E-03	9.00	1.2E-04 (B)	1.8E-03	40.0	4.6E-05 (B)	7.7E-05	40.0	1.9E-06 (B)	--	--
Methanol	67-56-1	3.8E-04	(B)	--	5.7E-04	(F)	--	2.8E-05	(B)	--	3.8E-04	4,000	9.4E-08 (B)	6.7E-04	18,000	3.7E-08 (B)	2.8E-05	18,000	1.6E-09 (B)	--	--
Phenol	108-95-2	2.1E-07	(B)	--	3.2E-07	(F)	--	1.6E-08	(B)	--	2.1E-07	200	1.1E-09 (B)	3.8E-07	880	4.3E-10 (B)	1.6E-08	880	1.8E-11 (B)	--	--
<b>RESIN4</b>																					
Cumulative TEU Risk		--	--	0	--	--	0	--	--	0	--	--	0	--	--	0	--	--	0	--	--
Dispersion Factor (ug/m <sup>3</sup> /(g/s))		--			--			--			--			--			--			--	--
Epichlorohydrin	106-89-8	--	0.043	-- (B)	--	0.52	-- (B)	--	1.10	-- (B)	--	3.00	-- (B)	--	13.0	-- (B)	--	-- (B)	--	-- (B)	--

Toxic Air Contaminant	CAS	Cancer									Noncancer																													
		Residential			Worker			Child			Residential			Worker			Child			Acute Hazard Index <sup>(3)</sup>																				
		Calculated Conc. (6)	RBC <sup>(2)</sup> (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (6)	RBC <sup>(2)</sup> (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (6)	RBC <sup>(2)</sup> (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (6)	RBC <sup>(2)</sup> (ug/m <sup>3</sup> )	Hazard Index	Calculated Conc. (6)	RBC <sup>(2)</sup> (ug/m <sup>3</sup> )	Hazard Index	Calculated Conc. (6)	RBC <sup>(2)</sup> (ug/m <sup>3</sup> )	Hazard Index																					
<b>PAINT</b>																																								
Cumulative TEU Risk		--	--	0	--	--	0	--	--	0	--	--	4.4E-04	--	--	2.1E-04	--	--	2.6E-06	--																				
Dispersion Factor (ug/m <sup>3</sup> /(g/s))			25.2			39.9			0.64			25.2			52.5			0.64																						
Ethylene glycol monobutyl ether	111-76-2	0.036	(6)	--	0.057	(7)	--	9.4E-04	(8)	--	0.036	82.0	4.4E-04	(9)	0.075	360	2.1E-04	(10)	9.4E-04	360	2.6E-06	(11)																		
<b>WELD</b>																																								
Cumulative TEU Risk		--	--	0.015	--	--	6.7E-04	--	--	3.9E-05	--	--	9.8E-04	--	--	3.7E-04	--	--	9.6E-06	--																				
Dispersion Factor (ug/m <sup>3</sup> /(g/s))			15.2			21.9			0.67			15.2			25.9			0.67																						
Chromium VI	18540299p	4.7E-07	(6)	3.1E-05	(6)	0.015	(6)	6.7E-07	(7)	1.0E-03	(7)	6.7E-04	(8)	2.0E-08	(8)	5.2E-04	(8)	3.9E-05	(8)	4.7E-07	(9)	0.083	(9)	5.6E-06	(9)	8.0E-07	(9)	0.88	(9)	9.0E-07	(9)	2.0E-08	(9)	0.88	(9)	2.3E-08	(9)	--		
Cobalt and compounds	7440-48-4	5.7E-08	(6)	--	--	8.2E-08	(7)	--	--	2.5E-09	(7)	--	--	5.7E-08	(8)	0.10	(8)	5.7E-07	(8)	9.7E-08	(8)	0.44	(8)	2.2E-07	(8)	2.5E-09	(8)	0.44	(8)	5.7E-09	(8)	--	--	2.5E-09	(8)	0.44	(8)	5.7E-09	(8)	--
Aluminum and compounds	7429-90-5	3.3E-04	(6)	--	--	4.8E-04	(7)	--	--	1.5E-05	(7)	--	--	3.3E-04	(8)	5.00	(8)	6.6E-05	(8)	5.6E-04	(8)	22.0	(8)	2.6E-05	(8)	1.5E-05	(8)	22.0	(8)	6.6E-07	(8)	--	--	1.5E-05	(8)	22.0	(8)	6.6E-07	(8)	--
Copper and compounds	7440-50-8	3.4E-07	(6)	--	--	4.9E-07	(7)	--	--	1.5E-08	(7)	--	--	3.4E-07	(8)	(9)	--	--	5.8E-07	(8)	(10)	--	--	--	--	1.5E-08	(8)	(11)	--	--	--	--	1.5E-08	(8)	(11)	--	--			
Manganese and compounds	7439-96-5	6.3E-05	(6)	--	--	9.0E-05	(7)	--	--	2.7E-06	(7)	--	--	6.3E-05	(8)	0.090	(8)	7.0E-04	(8)	1.1E-04	(8)	0.40	(8)	2.7E-04	(8)	2.7E-06	(8)	0.40	(8)	6.9E-06	(8)	--	--	2.7E-06	(8)	0.40	(8)	6.9E-06	(8)	--
Nickel and compounds	7440020in	2.9E-06	(6)	--	--	4.2E-06	(7)	--	--	1.3E-07	(7)	--	--	2.9E-06	(8)	0.014	(8)	2.1E-04	(8)	5.0E-06	(8)	0.062	(8)	8.0E-05	(8)	1.3E-07	(8)	0.062	(8)	2.1E-06	(8)	--	--	1.3E-07	(8)	0.062	(8)	2.1E-06	(8)	--
Fluorides	FLUORIDES	5.2E-05	(6)	--	--	7.5E-05	(7)	--	--	2.3E-06	(7)	--	--	5.2E-05	(8)	(9)	--	--	8.8E-05	(8)	(10)	--	--	--	--	2.3E-06	(8)	(11)	--	--	--	--	2.3E-06	(8)	(11)	--	--			
<b>BPOI</b>																																								
Cumulative TEU Risk		--	--	0	--	--	0	--	--	0	--	--	3.9E-05	--	--	1.8E-05	--	--	4.7E-07	--																				
Dispersion Factor (ug/m <sup>3</sup> /(g/s))			11.4			19.9			0.61			11.4			23.1			0.61																						
Antimony and compounds	7440-36-0	3.7E-06	(6)	--	--	6.4E-06	(7)	--	--	2.0E-07	(7)	--	--	3.7E-06	(8)	0.30	(8)	1.2E-05	(8)	7.5E-06	(8)	1.30	(8)	5.8E-06	(8)	2.0E-07	(8)	1.30	(8)	1.5E-07	(8)	--	--	2.0E-07	(8)	1.30	(8)	1.5E-07	(8)	--
Copper and compounds	7440-50-8	3.7E-06	(6)	--	--	6.4E-06	(7)	--	--	2.0E-07	(7)	--	--	3.7E-06	(8)	(9)	--	--	7.5E-06	(8)	(10)	--	--	--	--	2.0E-07	(8)	(11)	--	--	--	--	2.0E-07	(8)	(11)	--	--			
Nickel and compounds	7440020in	3.7E-07	(6)	--	--	6.4E-07	(7)	--	--	2.0E-08	(7)	--	--	3.7E-07	(8)	0.014	(8)	2.6E-05	(8)	7.5E-07	(8)	0.062	(8)	1.2E-05	(8)	2.0E-08	(8)	0.062	(8)	3.2E-07	(8)	--	--	2.0E-08	(8)	0.062	(8)	3.2E-07	(8)	--
<b>SCR HYDRO</b>																																								
Cumulative TEU Risk		--	--	3.9E-04	--	--	4.9E-05	--	--	9.5E-07	--	--	3.0E-03	--	--	1.3E-03	--	--	4.6E-05	--																				
Dispersion Factor (ug/m <sup>3</sup> /(g/s))			10.0			15.5			0.65			10.0			18.5			0.65																						
Acetaldehyde	75-07-0	1.5E-04	(6)	0.45	(6)	3.4E-04	(6)	2.4E-04	(6)	5.50	(6)	4.3E-05	(6)	9.9E-06	(6)	12.0	(6)	8.3E-07	(6)	1.5E-04	(6)	140	(6)	1.1E-06	(6)	2.8E-04	(6)	620	(6)	4.6E-07	(6)	9.9E-06	(6)	620	(6)	1.6E-08	(6)	--		
Acetone	67-64-1	3.9E-04	(6)	--	--	6.1E-04	(7)	--	--	2.6E-05	(7)	--	--	3.9E-04	(8)	31,000	(8)	1.3E-08	(8)	7.3E-04	(8)	140,000	(8)	5.2E-09	(8)	2.6E-05	(8)	140,000	(8)	1.8E-10	(8)	--	--	2.6E-05	(8)	140,000	(8)	1.8E-10	(8)	--
Acrolein	107-02-8	1.0E-03	(6)	--	--	1.6E-03	(7)	--	--	6.7E-05	(7)	--	--	1.0E-03	(8)	0.35	(8)	2.9E-03	(8)	1.9E-03	(8)	1.50	(8)	1.3E-03	(8)	6.7E-05	(8)	1.50	(8)	4.5E-05	(8)	--	--	6.7E-05	(8)	1.50	(8)	4.5E-05	(8)	--
Formaldehyde	50-00-0	7.7E-06	(6)	0.17	(6)	4.5E-05	(6)	1.2E-05	(6)	2.00	(6)	6.0E-06	(6)	5.0E-07	(6)	4.30	(6)	1.2E-07	(6)	7.7E-06	(6)	9.00	(6)	8.6E-07	(6)	1.4E-05	(6)	40.0	(6)	3.6E-07	(6)	5.0E-07	(6)	40.0	(6)	1.3E-08	(6)	--		
Methyl isobutyl ketone (MIBK, Hexone)	108-10-1	3.5E-05	(6)	--	--	5.5E-05	(7)	--	--	2.3E-06	(7)	--	--	3.5E-05	(8)	3,000	(8)	1.2E-08	(8)	6.5E-05	(8)	13,000	(8)	5.0E-09	(8)	2.3E-06	(8)	13,000	(8)	1.8E-10	(8)	--	--	2.3E-06	(8)	13,000	(8)	1.8E-10	(8)	--
Phenol	108-95-2	2.2E-06	(6)	--	--	3.5E-06	(7)	--	--	1.5E-07	(7)	--	--	2.2E-06	(8)	200	(8)	1.1E-08	(8)	4.2E-06	(8)	880	(8)	4.2E-06	(8)	1.5E-07	(8)	880	(8)	1.7E-10	(8)	--	--	1.5E-07	(8)	880	(8)	1.7E-10	(8)	--
Propionaldehyde	123-38-6	4.5E-04	(6)	--	--	7.0E-04	(7)	--	--	2.9E-05	(7)	--	--	4.5E-04	(8)	8.00	(8)	5.7E-05	(8)	8.4E-04	(8)	35.0	(8)	2.4E-05	(8)	2.9E-05	(8)	35.0	(8)	8.4E-07	(8)	--	--	2.9E-05	(8)	35.0	(8)	8.4E-07	(8)	--
<b>HYDRO</b>																																								
Cumulative TEU Risk		--	--	0.041	--	--	4.8E-03	--	--	1.0E-04	--	--	2.9E-04	--	--	1.1E-04	--	--	4.4E-06	--																				
Dispersion Factor (ug/m <sup>3</sup> /(g/s))			9.99			14.2			0.67			9.99			16.5			0.67																						
Acetaldehyde	75-07-0	0.016	(6)	0.45	(6)	0.036	(6)	0.023	(6)	5.50	(6)	4.2E-03	(6)	1.1E-03	(6)	12.0	(6)	9.0E-05	(6)	0.016	(6)	140	(6)	1.1E-04	(6)	0.027	(6)	620	(6)	4.3E-05	(6)	1.1E-03	(6)	620	(6)	1.7E-06	(6)	--		
Acetone	67-64-1	1.9E-03	(6)	--	--	2.7E-03	(7)	--	--	1.3E-04	(7)	--	--	1.9E-03	(8)	31,000	(8)	6.2E-08	(8)	3.2E-03	(8)	140,000	(8)	2.3E-08	(8)	1.3E-04	(8)	140,000	(8)	9.2E-10	(8)	--	--	1.3E-04	(8)	140,000	(8)	9.2E-10	(8)	--
Acrolein	107-02-8	1.6E-22	(6)	--	--	2.3E-22	(7)	--	--	1.1E-23	(7)	--	--	1.6E-22	(8)	0.35	(8)	4.6E-22	(8)	2.7E-22	(8)	1.50	(8)	1.8E-22	(8)	1.1E-23	(8)	1.50	(8)	7.2E-24	(8)	--	--	1.1E-23	(8)	1.50	(8)	7.2E-24	(8)	--
Formaldehyde	50-00-0	8.7E-04	(6)	0.17	(6)	5.1E-03	(6)	1.2E-03	(6)	2.00	(6)	6.2E-04	(6)	5.9E-05	(6)	4.30	(6)	1.4E-05	(6)	8.7E-04	(6)	9.00	(6)	9.7E-05	(6)	1.4E-03	(6)	40.0	(6)	3.6E-05	(6)	5.9E-05	(6)	40.0	(6)	1.5E-06	(6)	--		
Methyl isobutyl ketone (MIBK, Hexone)	108-10-1	7.3E-03	(6)	--	--	0.010	(7)	--	--	4.9E-04	(7)	--	--	7.3E-03	(8)	3,000	(8)	2.4E-06	(8)	0.012	(8)	13,000	(8)	9.3E-07	(8)	4.9E-04	(8)	13,000	(8)	3.8E-08	(8)	--	--	4.9E-04	(8)	13,000	(8)	3.8E-08	(8)	--
Phenol	108-95-2	2.3E-05	(6)	--	--	3.2E-05	(7)	--	--	1.5E-06	(7)	--	--	2.3E-05	(8)	200	(8)	1.1E-07	(8)	3.8E-05	(8)	880	(8)	4.3E-08	(8)	1.5E-06	(8)	880	(8)	1.7E-09	(8)	--	--	1.5E-06	(8)	880	(8)	1.7E-09	(8)	--
Propionaldehyde	123-38-6	5.9E-04	(6)	--	--	8.4E-04	(7)	--	--	4.0E-05	(7)	--	--	5.9E-04	(8)	8.00	(8)	7.4E-05	(8)	9.8E-04	(8)	35.0	(8)	2.8E-05	(8)	4.0E-05	(8)	35.0	(8)	1.1E-06	(8)	--	--	4.0E-05	(8)	35.0	(8)	1.1E-06	(8)	--
<b>CLAR</b>																																								
Cumulative TEU Risk		--	--	3.5E-05	--	--	5.2E-06	--	--	1.7E-07	--	--	2.9E-07	--	--	1.2E-07	--	--	8.3E-09	--																				
Dispersion Factor (ug/m <sup>3</sup> /(g/s))			6.04			10.9			0.77			6.04			10.9			0.77																						
Acetaldehyde	75-07-0	1.2E-05	(6)	0.45	(6)	2.6E-05	(6)	2.1E-05	(6)	5.50	(6)	3.8E-06	(6)	1.5E-06	(6)	12.0	(6)	1.2E-07	(6)	1.2E-05	(6)	140	(6)	8.2E-08	(6)	2.1E-05	(6)	620	(6)	3.4E-08	(6)	1.5E-06	(6)	620	(6)	2.4E-09	(6)	--		
Acetone	67-64-1	6.5E-08	(6)	--	--	1.2E-07	(7)	--	--	8.3E-09	(7)	--	--	6.5E-08	(8)	31,000	(8)	2.1E-12	(8)	1.2E-07	(8)	140,000	(8)	8.5E-13	(8)	8.3E-09	(8)	140,000	(8)	5.9E-14	(8)	--	--	8.3E-09	(8)	140,000	(8)	5.9E-14	(8)	--
Acrolein	107-02-8	3.1E-26	(6)	--	--	5.6E-26	(7)	--	--	4.0E-27	(7)	--	--	3.1E-26	(8)	0.35	(8)	8.9E-26	(8)	5.7E-26	(8)	1.50	(8)	3.8E-26	(8)	4.0E-27	(8)	1.50	(8)	2.6E-27	(8)	--	--	4.0E-27	(8)	1.50	(8)	2.6E-27	(8)	--
Formaldehyde	50-00-0	1.5E-06	(6)	0.17	(6)	9.0E-06	(6)	2.8E-06	(6)	2.00	(6)	1.4E-06	(6)	1.9E-07	(6)	4.30	(6)	4.5E-08	(6)	1.5E-06	(6)	9.00	(6)	1.7E-07	(6)	2.8E-06	(6)	40.0	(6)	6.9E-08	(6)	1.9E-07	(6)	40.0	(6)	4.9E-09	(6)	--		
Methyl isobutyl ketone (MIBK, Hexone)	108-10-1	2.6E-07	(6)	--	--	4.7E-07	(7)	--	--	3.3E-08	(7)	--	--	2.6E-07	(8)	3,000	(8)	8.7E-11	(8)	4.7E-07	(8)	13,000	(8)	3.7E-11	(8)	3.3E-08	(8)	13,000	(8)	2.6E-12	(8)	--	--	3.3E-08	(8)	13,000	(8)	2.6E-12	(8)	--
Phenol	108-95-2	2.4E-12	(6)	--	--	4.4E-12	(7)	--	--	3.1E-13	(7)	--	--	2.4E-12	(8)	200	(8)	1.2E-14																						

Toxic Air Contaminant	CAS	Cancer									Noncancer									
		Residential			Worker			Child			Residential			Worker			Child			Acute
		Calculated Conc. (6)	RBC (2) (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (6)	RBC (2) (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (6)	RBC (2) (ug/m <sup>3</sup> )	Excess Risk Per Million	Calculated Conc. (6)	RBC (2) (ug/m <sup>3</sup> )	Hazard Index	Calculated Conc. (6)	RBC (2) (ug/m <sup>3</sup> )	Hazard Index	Calculated Conc. (6)	RBC (2) (ug/m <sup>3</sup> )	Hazard Index	Hazard Index (3)
<b>ABASE</b>		--	--	<b>2.9E-03</b>	--	--	<b>4.5E-04</b>	--	--	<b>1.0E-05</b>	--	--	<b>2.3E-05</b>	--	--	<b>1.0E-05</b>	--	--	<b>5.0E-07</b>	--
<b>Cumulative TEU Risk</b>		--	--	<b>7.92</b>	--	--	<b>15.2</b>	--	--	<b>0.76</b>	--	--	<b>7.92</b>	--	--	<b>15.8</b>	--	--	<b>0.76</b>	--
<b>Dispersion Factor (ug/m<sup>3</sup>)(g/s)</b>		<b>7.92</b>		<b>15.2</b>			<b>0.76</b>			<b>7.92</b>			<b>15.8</b>			<b>0.76</b>			<b>--</b>	
Acetaldehyde	75-07-0	9.6E-04	0.45	2.1E-03 (6)	1.8E-03	5.50	3.4E-04 (6)	9.1E-05	12.0	7.6E-06 (6)	9.6E-04	140	6.8E-06 (6)	1.9E-03	620	3.1E-06 (6)	9.1E-05	620	1.5E-07 (6)	--
Acetone	67-64-1	4.4E-06	(6)	--	8.5E-06	(7)	--	4.2E-07	(8)	--	4.4E-06	31,000	1.4E-10 (6)	8.8E-06	140,000	6.3E-11 (6)	4.2E-07	140,000	3.0E-12 (6)	--
Acrolein	107-02-8	2.9E-24	(6)	--	5.6E-24	(7)	--	2.8E-25	(8)	--	2.9E-24	0.35	8.3E-24 (6)	5.8E-24	1.50	3.9E-24 (6)	2.8E-25	1.50	1.9E-25 (6)	--
Formaldehyde	50-00-0	1.2E-04	0.17	7.2E-04 (6)	2.4E-04	2.00	1.2E-04 (6)	1.2E-05	4.30	2.7E-06 (6)	1.2E-04	9.00	1.4E-05 (6)	2.4E-04	40.0	6.1E-06 (6)	1.2E-05	40.0	2.9E-07 (6)	--
Methyl isobutyl ketone (MIBK, Hexone)	108-10-1	5.1E-05	(6)	--	9.8E-05	(7)	--	4.9E-06	(8)	--	5.1E-05	3,000	1.7E-08 (6)	1.0E-04	13,000	7.8E-09 (6)	4.9E-06	13,000	3.7E-10 (6)	--
Phenol	108-95-2	1.6E-10	(6)	--	3.0E-10	(7)	--	1.5E-11	(8)	--	1.6E-10	200	7.8E-13 (6)	3.1E-10	880	3.5E-13 (6)	1.5E-11	880	1.7E-14 (6)	--
Propionaldehyde	123-38-6	2.3E-05	(6)	--	4.3E-05	(7)	--	2.2E-06	(8)	--	2.3E-05	8.00	2.8E-06 (6)	4.5E-05	35.0	1.3E-06 (6)	2.2E-06	35.0	6.2E-08 (6)	--

**Notes**  
 lb = pound; yr = year; ug = microgram; m<sup>3</sup> = cubic meter; RBC = risk-based concentration; TAC = toxic air contaminant.  
 (6) Calculated concentration (ug/m<sup>3</sup>) = (dispersion factor [(ug/m<sup>3</sup>)(g/s)]) x (TAC emission rate per TEU (g/s))  
 TAC emission rate per TEU (g/s) = (1)  
 (8) Excess cancer risk = (annual concentration [ug/m<sup>3</sup>]) / (RBC cancer [ug/m<sup>3</sup>])

- References**
- (1) See Table 4-2, Proposed Annual TAC Emission Rates.
  - (2) OAR 340-245-8010, Table 2.
  - (3) Represents highest modeled acute risk using the risk equivalent emission rates shown in Table 4-4.
  - (4) See Table 7-3, Maximum Predicted Risk Exposure Location per Significant TEU (Chronic Only).
  - (5) Risk comparison value is the facility total risk rounded in accordance with OAR 340-245-0020(4)(a)(A).
  - (6) This TAC does not have a residential cancer RBC listed in OAR 340-245-8010, Table 2.
  - (7) This TAC does not have a worker cancer RBC listed in OAR 340-245-8010, Table 2.
  - (8) This TAC does not have a child cancer RBC listed in OAR 340-245-8010, Table 2.
  - (9) This TAC does not have a residential noncancer RBC listed in OAR 340-245-8010, Table 2.
  - (10) This TAC does not have a worker noncancer RBC listed in OAR 340-245-8010, Table 2.
  - (11) This TAC does not have a child noncancer RBC listed in OAR 340-245-8010, Table 2.