

Boise Cascade Wood Products, LLC  
PO Box 100  
Medford, OR 97501  
P 541 776 6666



January 13, 2025  
Katie Eagleson  
Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232

RE: Extension Request for Submittal of the Cleaner Air Oregon Emissions Inventory  
Boise Cascade Wood Products, L.L.C.—Medford, Oregon  
Permit #15-0004-TV-01

Dear Katie:

Boise Cascade Wood Products, L.L.C. (Boise Cascade) received written notice from the Oregon Department of Environmental Quality (DEQ) on October 30, 2024, that the facility located at 3285 North Pacific Highway in Medford, Oregon 97501, was being called into the Cleaner Air Oregon (CAO) program. As stated in the call-in letter, the CAO emissions inventory is due by January 28, 2025. Per Oregon Administrative Rule (OAR) 340-245-0030(3), an owner or operator may submit for an extension of time to a submittal deadline by providing a written request to the agency no fewer than 15 days prior to the submittal deadline. With this letter, Boise Cascade is formally requesting an extension to the CAO emissions inventory submissions deadline.

Since receiving the call-in letter, Boise Cascade retained Maul Foster & Alongi, Inc. (MFA) to assist with developing the CAO emissions inventory submittal. Significant progress has already been made to characterize toxic air contaminant (TAC) emissions from sources and activities at the facility. This includes detailed reviews and analyses of the multiple source test reports and reference documents serving as the basis for TAC emissions presented in the existing Title V Operating Permit issued to the facility, in addition to the significant data collection efforts required to parameterize and quantify emissions from activities no longer considered categorically exempt under the CAO permitting program.

Boise Cascade is working diligently to gather the additional data and information needed for these nonexempt activities, including various storage tanks, welding activities and TAC-containing products used around the facility. However, we will need more time to work with MFA to identify the specific products and activities applicable to the CAO permitting program, determine appropriate product usage rates, and to prepare the emission calculations for both the 2023 calendar year and the requested potential to emit operating scenarios.

Both Boise Cascade and MFA were short staffed over the holiday season (e.g., Thanksgiving week to weeks surrounding Christmas and New Year's). As a result, Boise Cascade is kindly requesting a 60-day extension to our CAO emissions inventory deadline, establishing a new deadline on March 29, 2025. Extending the deadline will allow for us to give this response the appropriate attention it requires.

Thank you for your consideration of this request. I look forward to hearing back from you soon.

Sincerely,



Shauna Rosendaul  
Regional Environmental Manager