



# Oregon

Tina Kotek, Governor

## Department of Environmental Quality

### Agency Headquarters

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November 21, 2024

Columbia Forest Products, Inc.  
South Highway 97  
Klamath Falls, OR 97601  
*Sent via email only*

Bill Surber,

Columbia Forest Products, Inc. (Columbia) was called in to the Cleaner Air Oregon (CAO) program on August 29, 2024. Columbia contacted DEQ on November 8, 2024, via their consultant, SLR Consulting, to indicate that they would be requesting an extension due to the considerable data analysis required to characterize emissions from the facility. On November 12, 2024, DEQ received a request from Columbia for a 90-day extension of the deadline for submittal of the Emissions Inventory (Inventory).

DEQ may grant an extension based on the criteria set in [OAR 340-245-0030\(3\)](#), which require sources to demonstrate progress towards completing the submittal and show that a delay is necessary for good cause. DEQ understands that Columbia has demonstrated progress on the Inventory by collecting and reviewing emission factors, compiling chemical and material usage data, screening safety data sheets, and determining operating scenarios. An additional consideration specific to this request is that this source was originally prioritized in 2018 to be called-in to the CAO program in Prioritization Group 3 but was recently moved up into Group 2 in March 2024. DEQ understands that this reprioritization and revised call-in timeline can affect a source's planning efforts to have resources available to perform the Risk Assessment required under the CAO program. Finally, DEQ met with Columbia's consultant regarding the request on November 20, 2024, and Columbia has committed to submitting the Modeling Protocol (Protocol) and Risk Assessment Work Plan (Work Plan) at the same time as the Inventory if DEQ were to grant the extension request.

Considering the progress made, the specific circumstances of the timing of the call-in for this source, and the facility's commitment to submitting multiple Risk Assessment technical documents simultaneously, DEQ approves Columbia's request and grants a 90-day extension from the previous submittal deadline of November 27, 2024. Columbia's Inventory, Protocol, Work Plan, and all supporting documents must be submitted by no later than **February 25, 2025**.

DEQ remains available to meet with Columbia or provide feedback via email. Please contact me directly at 503-913-6658 or [Katie.Eagleson@deq.oregon.gov](mailto:Katie.Eagleson@deq.oregon.gov), if you have any questions regarding this letter or CAO submittal requirements. I look forward to your continued assistance with this process.

Sincerely,

*Kathleen H Eagleson*

Katie Eagleson  
CAO Project Engineer

18-0014 Columbia Forest Products, Inc.

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