

February 24, 2025

Ms. Katie Eagleson
Oregon Department of Environmental Quality
Eastern Region
475 NE Bellevue, Suite 110
Bend, Oregon 97701

Re: Columbia Forest Products, Inc., Oregon Title V Operating Permit No. 18-0014-TV-01
Cleaner Air Oregon Air Toxics Emissions Inventory, Modeling Protocol, and Risk Assessment
Work Plan

Ms. Eagleson,

Columbia Forest Products, Inc. (Columbia) located in Klamath Falls, Oregon was notified on August 29, 2024 by Oregon Department of Environmental Quality (DEQ) the facility was called into the Cleaner Air Oregon (CAO) program. Per the call-in letter and OAR 340-245-0030(1)(a), the CAO Emissions Inventory Form (AQ520) was due by November 27, 2024. Columbia requested an extension, which was approved by the DEQ on November 21, 2024 and required the submittal of the Emission Inventory, Modeling Protocol (Protocol), and Risk Assessment Work Plan (Work Plan) by February 25, 2025.

Included with this submittal are the following data.

- CAO Emissions Inventory – only provided electronically in Excel format
 - Form AQ520 – CAO Air Toxics Reporting Form, including:
 - List of toxic emission units (TEUs) that emit toxic air contaminants (TACs)
 - List of activities used to calculate TAC emissions
 - List of TACs emitted
 - Names of resources used to obtain emission factors
 - Calculation formulas
 - Form AQ523 – Categorically Exempt Toxics Emissions Units
 - Supporting documentation, including:
 - Process flow diagram
 - Operating schedule
 - Safety Data Sheets (SDSs) – only provided electronically in a zip folder
 - Source test data – only provided electronically in a zip folder
- Combined Protocol and Work Plan, including:

The air toxics emissions inventory has been completed based on the best available information at this time and using facility knowledge and engineering estimates. Supporting documentation, such as SDSs and source test data, have been provided. Note that some emission factors are based on data from the National Council for Air and Stream Improvement (NCASI). Columbia is currently coordinated with NCASI for access to the emission factor source data (e.g., technical bulletins) and will provide the data to DEQ under separate cover.

Additionally, Form AQ523 (Categorically Exempt Toxics Emissions Units) has been completed based on current knowledge of facility operations, but may be updated as additional data becomes available.

Emission calculations for chemical usage were completed using the following methodologies:

Material Type	Material Name	TAC	Calculation Methodology
UV Line coatings	1. RD2930 SATIN GLOSS UV TOPCOAT 2. RD2950 Medium Gloss UV Topcoat 3. RD2911 LOW GLOSS SEALER	CAS No. 7631-86-9 – Silica, crystalline (respirable)	The material is in a wet form and is not expected to release respirable silica; TAC is retained on the product.
Boiler chemicals	1. Sodium Hydroxide Solution 2. Formula 1100 3. Formula 1156	CAS No. 1310-73-2 – Sodium hydroxide	Sodium hydroxide is a non-volatile chemical used in boiler water treatment and is expected to completely react and/or degrade.
Finishing materials	1. Dark Walnut Face Grade Putty 2. Red Oak Face Grade Putty	CAS No. 107-98-2 – Propylene glycol monomethyl ether	Emissions are calculated based on the vapor pressure of the TAC. See below.
Finishing materials	U-100-B PATCH CATALYST	CAS No. 101-68-8 – Methylene diphenyl diisocyanate	Emissions are calculated based on the vapor pressure of the TAC. See below.
UV Line cleaning	Glycol Ether EB	CAS No. 111-76-2 – Ethylene glycol monobutyl ether	Emissions are calculated based on the vapor pressure of the TAC. See below.
<p>TAC retained/reacted (lb) = product usage (lb) x concentration of TAC (%) x [1 – (vapor pressure of TAC / atmospheric vapor pressure)]</p> <ul style="list-style-type: none"> Pv (MDI) = 5.00E-06 mmHg Pv (Propylene glycol monomethyl ether) = 12 mmHg Pv (Ethylene glycol monobutyl ether) = 0.6 mmHg 			

If you have any questions regarding this submittal, I can be reached at (541) 882-7281, x2567 or wsurber@cfpwood.com.

Sincerely,



Bill Surber
Purchasing & Environmental Manager
Columbia Forest Products, Klamath Falls

Cc: Aaron Abts, Columbia Forest Products
Sarah Kronholm, SLR International Corporation

Attachments

Attachment A:

Form AQ520 – CAO Air Toxics Reporting Form

(provided electronically in Excel format)