



April 18, 2025

Stephen Wozab
Oregon Department of Environmental Quality
700 NE Multnomah St., Suite 600
Portland, OR 97232

Re: Mutual Materials Tunnel Kiln Source Test Report

Dear Stephen Wozab:

Mutual Materials received an official information request by letter dated November 18, 2024 (the Letter) from the Oregon Department of Environmental Quality (DEQ) requiring emissions testing on the exhaust duct of tunnel kiln. Mutual Materials performed the source test on February 19, 2025 for emissions of hydrogen fluoride (HF), hydrogen chloride, hydrogen bromide, chlorine, bromine and total fluoride. On behalf of Mutual Materials, Maul Foster & Alongi, Inc. is submitting this source test report to satisfy the requirements in the Letter.

Because reportable fluorides, as measured by EPA Method 13B, are zero after subtracting HF emissions as measured by EPA Method 26 the results demonstrate that there is a complete conversion of fluoride in the raw clay to HF during the firing process. Because the results demonstrate that emissions of reportable fluorides are negligible, Mutual Materials is not requesting an enforceable limit for fluorides as defined in OAR 340-200-0200(160)(k). Mutual Materials is requesting an enforceable limit on annual HF emissions to allow them to continue operating as a minor source. Additionally, Mutual Materials assumes that an HF emission factor based on the average of the 2014 and 2025 source test results will be incorporated into their permit.

If you have questions, please contact Leslie Riley at lriley@maulfoster.com, or James Smith at jcsmith@mutualmaterials.com.

Sincerely,

Maul Foster & Alongi, Inc.

Leslie Riley
Senior Air Quality Specialist