



March 12, 2025

Julia DeGagné, Cleaner Air Oregon Project Engineer  
Julia.Degagne@deq.oregon.gov  
(Submitted electronically via email)

Re: Hampton Lumber Mills, Inc.—Tillamook Lumber Company  
Cleaner Air Oregon Emissions Inventory Extension Request

Dear Julia:

Hampton Lumber Mills, Inc.—Tillamook Lumber Company (“Hampton Tillamook”) is writing with respect to our ongoing work to comply with the Cleaner Air Oregon (“CAO”) program. Since receiving the call-in letter from the Department of Environmental Quality (“DEQ”) on January 2, 2025 (“Call-In Letter”), Hampton Tillamook has made significant progress in completing the CAO Air Toxics Emission Inventory (“EI”). That progress is detailed below. The purpose of this letter is to request a short, 45-day, extension in which to complete and submit the EI to DEQ. Our requested new deadline is May 16, 2025. Our request is being made under OAR 340-245-0030(3) which states:

*(3) An owner or operator may request an extension of time from a deadline established in section (1) or section (2) by providing DEQ with a written request no fewer than 15 days prior to the submittal deadline. DEQ may grant an extension based on the following criteria:*

*(a) The owner or operator has demonstrated progress in completing the submittal; and*

*(b) A delay is necessary, for good cause shown by the owner or operator, related to obtaining more accurate or new data, performing additional analyses, or addressing changes in operations or other key parameters, any of which are likely to have a substantive impact on the outcomes of the submittal.*

As stated above, Hampton Tillamook has made significant progress in completing our EI. We have engaged an environmental consulting company, Bridgewater Group, with significant CAO experience to assist us in the preparation of the EI. Working with Bridgewater Group, we have completed substantial work to characterize air toxics emissions from the sources at our facility known to be covered by the CAO program. Bridgewater has completed a site visit, collected extensive information from the facility and assessed historically categorically insignificant activities that may no longer be exempt under the CAO program. However, as DEQ’s Call-In letter states, the EI required for CAO is “more detailed than previously submitted emissions information,” and preparing an accurate and complete EI submittal requires us to collect and verify information that we did not have reason to previously, which we are in the process of doing.

Hampton Tillamook is requesting this short extension to May 16, 2025 of the EI submittal deadline because we need additional time to:

- Obtain and verify more specific production data for maximum daily and annual emissions calculations; and
- Obtain and verify additional vendor information for consideration in developing emission factors.

Hampton Tillamook is committed to providing DEQ a complete and accurate EI that aligns with DEQ's expectations under the CAO program, and requests additional time to ensure it can do so. This request is being submitted more than 15 days prior to the submittal deadline.

Thank you for considering our request. In response, or if you have other questions, please contact Amy Peccia, Hampton's Environmental Manager, at [AmyPeccia@hamptonlumber.com](mailto:AmyPeccia@hamptonlumber.com) or by phone at (503) 876-1309.

Sincerely,



Ryan Pettit  
Mill Manager

cc: J.R. Giska, DEQ  
Amy Peccia, Hampton Lumber Mills  
Travis Quarles, Bridgewater Group