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September 3, 2025

acpi Wood Products, LLC
625 Hoffman Rd.
Independence, OR 97351
Sent via email only

John Hamlin,

DEQ received the submittal of the Cleaner Air Oregon (CAO) Emission Inventory (Inventory) for acpi Wood Products, LLC (acpi) in Independence, OR on April 28, 2025, and has completed an initial review.

In accordance with Oregon Administrative Rule (OAR) 340-245-0030(2), DEQ has determined that the following additional information, corrections, and updates are required to be submitted by **75 days** after issuance date of this letter, or **November 17, 2025**:

General Comments

1. Actual Emissions: Per OAR 340-245-0040(4)(a)(B)(i)(I), existing sources are required to submit actual annual and maximum daily production activities and usage for the calendar year preceding the DEQ call in. acpi is not required to submit emissions estimates for the Actual basis and these can be omitted from the revised Inventory requested under Specific Comment 3.

2. Requested PTE Emissions: DEQ and acpi have discussed revisions to the Potential to Emit (PTE) emission estimates to reduce the conservativeness of the assessment and be more reflective of potential emissions from the facility. This can be balanced with PTE estimates which allow the facility flexibility in material usage rates and material formulation changes to provide sufficient conservatism in the risk assessment.

   Additionally, acpi should consider different emissions/modeling scenarios which maximize flexibility of material usage across the coating lines and simplify the facility's material usage tracking. Since each spray booth has a discrete stack, acpi should consider assigning emissions to the stack which would produce the most conservative risk assessment. The analysis should be done for all receptor types (residential, nonresidential child, nonresidential worker, and acute) and the stack assignment may vary based on risk category.

3. Crystalline Silica: The CAS registry number (CASRN) of 7631-86-9 is for silica of both amorphous and crystalline form. However, at this time only crystalline silica (of respirable size) is a listed toxic air contaminant (TAC). The following silica materials are of the crystalline form: quartz (CASRN 14808-60-7), cristobalite (CASRN 14464-46-1), and tridymite (CASRN 15468-32-3). Materials under these CASRNs should be evaluated as crystalline silica and are potentially reportable as "silica, crystalline (respirable)" (CASRN 7631-86-9) for CAO. DEQ has reviewed Safety Data Sheets (SDSs) for materials used at acpi and found that in multiple materials which contain crystalline silica. DEQ has addressed required updates to the Inventory or supporting calculations in the proceeding "Specific Comments" section.

4. Trimethylbenzene: Numerous materials used at acpi contain trimethylbenzene (CASRN 25551-13-7). This CASRN is for a mixture of trimethylbenzene isomers. While CASRN 25551-13-7 is not included on the TAC priority list under OAR 340-247-8010 Table 1, the three individual

trimethylbenzene isomers are. Therefore, trimethylbenzene should be reported and acpi should assess risk using the risk-based concentrations for 1,2,3-trimethylbenzene (CASRN 526-73-8). DEQ has addressed required updates to the Inventory or supporting calculations in the proceeding "Specific Comments" section.

Specific Comments

1. **Safety Data Sheets**: DEQ reviewed both the safety data sheets (SDSs) and environmental data sheets (EDSs) for materials used at acpi. Based on this review, DEQ has the following additional data needs.
    a. Provide the most up-to-date copies of both the SDS and EDS for the following materials. DEQ noted significant discrepancies in formulations for these materials when comparing the SDS and EDS. Update the AQ520 as needed based on this review.
        i. BLACK PRIMER (FNPR 3100);
        ii. HARBOR MIST STAIN (FNST 2365);
        iii. HAZELNUT STAIN (FNST 3020);
        iv. STAIN DOCKSIDE (FNST 4250);
        v. ISLANDER BLUE SPRAY (FNTN 2101);
        vi. ENL BRIGHT RED (FNEN 2085);
        vii. ENAMEL FRAPPE (FNEN 3050);
        viii. ENAMEL DUSK (FNEN 3070);
        ix. ENAMEL DIVINITY (FNEN 3075);
        x. ENAMEL PERFECT STORM (FNEN 3095);
        xi. DARK GREY TX GLAZE (FNGL 1200);
        xii. OFF BLACK TX GLAZE (FNGL 1205);
        xiii. WHITE TX GLAZE (FNGL 1210);
        xiv. PEWTER DETAIL GALZE (FNGL 1228);
        xv. GLAZE HARVEST/EBONY SPRAY (FNGL 4015);
        xvi. GLAZE EBONY/SABLE DETAIL (FNGL 4055); and
        xvii. Acetone (FNAD 2248).
    b. DEQ was unable to identify a copy of the SDS for the following materials in the information provided by acpi. Provide a copy of the following SDSs for review:
        i. FN STN GINGER SNAP NGR (FNST 2243);
        ii. WALNUT NGR (FNST 2930);
        iii. HAZELNUT NGR (FNST 3025);
        iv. FIN SPRAY STAIN BASE (FNST 2740);
        v. ENAMEL WHITE TITAN BASE PAIL (FNEN 2074); and
        vi. ENAMEL CASTLEROCK (FNEN 3025).
    c. DEQ received EDS for several materials which were not included in acpi's "Independence Product Calculations" workbook. If these materials are no longer used, please confirm. If these materials are still in use, please update the Inventory as appropriate and provide copies of the SDSs for these materials. Included below are the Product Name, Product Number, and manufacturer from the material's EDS.
        i. Mineral Spirits (Product No. 154-2323, Sherwin-Williams);
        ii. Methyl Amyl Ketone (Product No. MAK, Sherwin-Williams);
        iii. SHER-WOOD® SB Stain, Eagle Rock Wipe FNST4035 (Product No. S64XXN43301-794347, Sherwin-Williams);

iv. SHER-WOOD® SB Stain, ESPRESSO WSFNST4045 (Product No. S64XXN43306-794347, Sherwin-Williams);
v. SHER-WOOD® SB Stain, FNST4075 HARVEST BRONZE WS (Product No. S64XXN43310-794347, Sherwin-Williams);
vi. SHER-WOOD® SB Stain, RUMBERRY WIPE (Product No. S64XXN43314-794347, Sherwin-Williams); and
vii. TITAN WHITE ENAMEL BASE (Product No. AUW0832, Valspar).

2. **Spray Booth Filter Efficiency**: DEQ will accept a maximum removal efficiency of 99.0 percent for the spray booth filter. If acpi would like to use a higher removal efficiency, provide additional information from the filter manufacturer to support this. Justification should include a discussion of the removal efficiency of the filters for different sizes of particulate – for example, 10 and 2.5 micrometer particulate matter.

3. **Revised Inventory**: Submit to DEQ a revised AQ520 Inventory Form, along with all supporting calculations in Excel format, as well as all information required under OAR 340-245-0040(4). Include the following updates to the AQ520:
    a. Per General Comment 1, acpi may omit emission estimates for the Actual basis.
    b. Update the Inventory as appropriate with information gathered during the review of SDSs and/or EDSs requested under Specific Comment 1.
    c. Unless acpi provides additional justification for a higher removal efficiency, revise the spray booth filter's removal efficiency to 99.0 percent as requested under Specific Comment 2.
    d. TEU-1 through TEU-16: DEQ has reviewed SDSs and EDSs for materials used at the coating lines at acpi and compared this information against acpi's information presented in the "Independence Product Calculations.xlsx" workbook. DEQ found multiple discrepancies in weight percent of individual TACs and in some instances missing TACs. DEQ has prepared a copy of acpi's "Coating Potential" worksheet from the "Independence Product Calculations.xlsx" workbook and incorporated the corrections into this worksheet. The workbook is included as Attachment A. Cells containing corrected information are highlighted green with a bold border and bolded text. DEQ has excluded edits to materials for which additional information has been requested under Specific Comment 1. Note, for those materials with both an SDS and an EDS, DEQ used the TAC composition from the EDS in the evaluation. For SDS composition information that was presented as other than an exact number, DEQ followed guidance presented in Section 5 of DEQ's "Cleaner Air Oregon Emissions Inventory Form AQ520" Instructions document.[1] Note also that the revisions requested by DEQ are only for those instances where acpi had a lower composition than information presented in the SDS or EDS. See the specific edits incorporated in Attachment A. These edits include:
        i. Revisions to density for materials.
        ii. Revisions to material composition for the following compounds:
            1. Xylene (CASRN 1330-20-7);
            2. Ethyl benzene (CASRN 100-41-4);
            3. Cumene (CASRN 98-82-8);
            4. Formaldehyde (CASRN 50-00-0);
            5. 1-Butanol (CASRN 71-36-3);

[1] Oregon DEQ. June 5, 2025. "Cleaner Air Oregon Emissions Inventory Form AQ520." (https://www.oregon.gov/deq/aq/cao/Documents/AQ520FormInstructions.pdf)

6. 1,2,4-trimethylbenzene (CASRN 95-63-6);
7. Mercury (CASRN 7439-97-6);
8. Lead (CASRN 7439-92-1);
9. Cobalt (CASRN 7440-48-4);
10. Manganese (CASRN 7439-96-5); and
11. 1,2,5-trimethylbenzene (CASRN 108-67-8).

iii. Addition of the following TACs not previously included:

1. Aluminum (7429-90-5)
    a. There are multiple materials which contain Kaolin (CASRN 1332-58-7), which is an aluminum containing compound. Account for the aluminum (CASRN 7429-90-5) content of kaolin ($Al_2Si_2O_5(OH)_4$) by multiplying the weight percentage of kaolin by 0.209 (the ratio of the atomic weight of two aluminum atoms and the molecular weight of kaolin).
    b. Glaze Pewter Detail (FNGL 4060) contains aluminum hydroxide (CASRN 21645-51-2), which is an aluminum containing compound. Account for the aluminum (CASRN 7429-90-5) content of aluminum hydroxide ($Al(OH)_3$) by multiplying the weight percentage of aluminum hydroxide by 0.346 (the ratio of the atomic weight of the aluminum atom and the molecular weight of aluminum hydroxide);
2. Silica, crystalline (respirable) (CASRN 7631-86-9). Per General Comment 3, report all forms of crystalline silica, including quartz (CASRN 14808-60-7), cristobalite (CASRN 14464-46-1), and tridymite (CASRN 15468-32-3); and
3. Trimethylbenzene (CASRN 25551-13-7). Per General Comment 4, report trimethylbenze as all isomers are listed TACs.

e. TEU-20: Review of the SDS for material G-2949 MUI (GLUE330410) shows a methanol (CASRN 67-56-1) content of "<0.1%." Update emissions for this material to include methanol. acpi should reference Section 5 of DEQ's "Cleaner Air Oregon Emissions Inventory Form AQ520" Instructions document for reporting TACs from SDSs.[1]

f. JOWATHERM 288.60: DEQ reviewed the SDS for this material and noted it has barium sulphate (7727-43-7) listed under the SARA Section 313 subsection of the Regulatory Information section. If this material is still in use, acpi should evaluate potential emissions of barium (CASRN 7440-39-3) from its use. Assume the de minimis concentration of 1.0 percent.[2]

DEQ is requesting that you submit additional information to complete your Inventory. If you think that any of that information is confidential, trade secret or otherwise exempt from disclosure, in whole or in part, you must comply with the requirements in OAR 340-214-0130 to identify this information. This includes clearly marking each page of the writing with a request for exemption from disclosure and stating the specific statutory provision under which you claim exemption. Emissions data is not exempt from disclosure.

DEQ remains available to discuss this information request with you and answer any questions you may have. Failure to provide additional information, corrections, or updates to DEQ by the deadlines above may result in a violation of OAR 340-245-0030(1).

[2] EPA. "EPCRA Section 313 Chemical List for Reporting Year 2016." (https://www.epa.gov/sites/default/files/2017-09/documents/ry16_tri_chemical_list.pdf)

If you have any questions regarding this letter please contact me directly at (971) 300-3653 or amy.devita-mcbride@deq.oregon.gov. I look forward to your continued assistance with this process.

Sincerely,

Amy DeVita-McBride

Amy DeVita-McBride
Cleaner Air Oregon Project Engineer

Enc: Attachment A: DEQ Revisions to Coating Material SDS/EDS Information (Excel File)

Cc: John Batrouny, Cabinetworks Group
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