Oregon
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September 24, 2025

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Sent electronically only

Quinn Burke-Anderson,

DEQ received the revised submittal of the Cleaner Air Oregon (CAO) Emissions Inventory, Modeling Protocol, Risk Assessment Work Plan, and Level 3 Risk Assessment for reassessment of risk for the Stimson Lumber Company (Stimson) facility in Gaston, OR on August 5, 2025. These CAO materials were initially submitted on April 23, 2025, concurrently with a Construction ACDP Application for Title V Permit No. 34-2066-TV-01, in which Stimson proposes to expand operations at the facility with the construction of a new sawmill. DEQ provided comments on the initial submittal on June 10, 2025.

Stimson's original CAO risk assessment was approved by DEQ on August 5, 2024. Because Stimson has been notified in writing by DEQ that they are required to submit a risk assessment but has not yet been issued a Toxic Air Contaminant Permit Addendum, Stimson is required to revise and update their CAO Risk Assessment materials to include the proposed new or modified Toxics Emissions Units (TEUs) by a date certain. [Oregon Administrative Rule OAR 340-245-0060(4)(b)]

In accordance with OAR 340-245-0030(4)(b), DEQ is providing Stimson with a revised deadline for submittal of a revised Emissions Inventory, Modeling Protocol, Risk Assessment Work Plan, and Level 3 Risk Assessment. Please submit the information specified below by **October 24, 2025**.

I. General Comment

Stimson has included one "Boiler Startup" emissions scenario in the Emissions Inventory and Risk Assessment, as required by OAR 340-245-0040(4)(b)(B)(i). DEQ may include permit conditions that limit operations to the assumptions used in the risk assessment, including the startup scenario. Based on the Risk Assessment submitted, these permit limits could include:

- Limiting startup time to no more than 8 hours per day and 640 hours per year;
- Limiting annual boiler and kiln throughputs to the activity values modeled in the startup scenario; and
- Limiting daily kiln, fuel dryer, and hardboard plant (press, refiner, and former) throughputs to the activity values modeled in the startup scenario during days when a startup occurs.

If Stimson requires permit limits at the maximum activity values indicated in the "Normal Operations" operating scenario, the Risk Assessment must include a scenario that both reflects the desired maximum activity values and incorporates the desired startup time, or otherwise demonstrate that the worst-case risk has been modeled for all potential combinations of startup hours and normal operations.

As an example, DEQ has modeled risk for a conservative scenario that includes all emissions modeled in the "Normal Operations" scenario plus what DEQ understands to be the additional emissions that could be associated with 8 hours per day and 640 hours per year of startup time for the boilers. DEQ's analysis includes some conservative emissions estimates that may not be possible at the facility, due to operational limitations inherent in the startup process and the capacity of the emission units. However, calculating risk using assumptions such as these would allow permitting to proceed using the daily and annual activity values presented by Stimson in the "normal operations" scenario, with an additional limit on startup time. This would simplify permit conditions and recordkeeping. DEQ's emissions assumptions and calculated risk are shown in Attachment 1 to this letter.

II. Specific Comments

Startup Scenario

1. If Stimson is requesting to be permitted at the maximum activity values indicated in the "Normal Operations" operating scenario, submit an additional modeled scenario or scenarios that either:
    a. reflect the desired maximum activity values and incorporate the desired startup time, or
    b. otherwise demonstrate that the worst-case risk has been modeled for all potential combinations of startup hours and normal operations.

Emissions Inventory

2. Update the emissions calculations in Appendix A to the Construction ACDP ("Emissions Calculations Workbook") and the CAO AQ520 forms as follows, and incorporate changes into the Risk Assessment as applicable:
    a. Boiler with ESP control (TEU H-BLR_ESP): For the Boiler Startup scenario, update the Max Daily Requested PTE activity in Worksheet 2 of the AQ520 form to 2,838 MMBtu/day to be consistent with the Emissions Calculation Workbook and emissions presented in Worksheet 3.
    b. Refiner stack (TEU H-RF12_STK): Include an additional TEU row on Worksheet 2 of the AQ520 forms to include the TEU activity in units of hours instead of ODT, and use this TEU to calculate toxic air contaminant (TAC) emissions where the emission factor units are "pounds per hour".
    c. Update the hardboard annual Requested PTE activity in Worksheet 2 of the AQ520 form ("Normal Operations" scenario only) for consistency with the Emissions Calculation Workbook:
        i. For RF12_STK, RF12_RV, and FORMER_STK, update to 35,640 ODT/year; and
        ii. For FORMER_STK, update to 3,564 ODT/year.
    d. Resin Tanks (TEUs RESIN2, RESIN3, and RESIN4):
        i. Update the calculation for Vented Vapor Saturation Factor in row 55 of the Emissions Calculations Workbook ("Resin_TAC" tab) to use the correct value for vapor pressure;
        ii. In Worksheet 3 of the Normal Operations AQ520 form, update the formula in the chemical name column to correctly populate for formaldehyde (CASRN 50-00-0); and
    e. Existing Planer Mill Cyclone Chipper (TEU S-CYC): Update S-CYC daily emissions for methanol (CASRN 67-56-1) in the AQ520 forms to match the Emissions Calculations Workbook (0.37 lb/day); and

f. Proposed Sawmill Overs Chipper (TEU SM-CHP): In Worksheet 2 of the AQ520 forms, update the TEU ID to "SM-CHP" for consistency with Worksheet 3.
g. In the "Source Tests" tab of the Emissions Calculations Workbook, review and update the Run 3 emission results for mercury from the December 2022 Source tests for H-DRY and H-BLR ESP – page 3 of DEQ's Source Test Review Report gives values of 8.2E-7 lb/MMBtu for the H-BLR ESP Run 3 and 1.1E-6 lb/MMBtu for H-DRY Run 3. The emission factor averages in the table are correct as-is, so emission factors are not affected by this change.
h. In the "HAP-TAC SUM SU" tab of the Emissions Calculation workbook, correct the emissions in the Hogged Fuel-Fired Boiler (ESP Control) and Hogged Fuel-Fired Boiler (MC Control) columns – these appear to be transposed.
i. Welding (WELD TEU): Review the emission factors in Worksheet 3 of the AQ520 forms and update to be consistent with the approved emissions calculations for chromium VI (CASRN 18540-29-9), manganese (CASRN 7439-96-5), zinc oxide (CASRN 1314-13-2), nickel (DEQ ID 365) and fluorides (DEQ ID 239). The emissions are correct as presented, so this correction will not impact modeled risk.

3. Update the emission factor references and footnotes as specified in Attachment 2 to this letter.

Modeling Protocol, Risk Assessment Work Plan, and Risk Assessment Report

4. Provide justification, such as the temperature profile during startup, that stack parameters during startup do not vary significantly from typical operating conditions for TEUs H-BLR_SCR, H-BLR_ESP, and H-BLR_MC, **or** update startup stack parameters appropriately.
5. In Tables 4-2 and 4-3, update the column header for Gas Storage Tank – currently the (g/s) column is mislabeled as (lb/yr).
6. Update the "Facility Total" column in Tables 4-4 and 4-5 so that it does not double-count emissions from the resin storage tank and whitewater chest (Model ID WHITE).
7. Update Figures 7-3 and 7-4 to be consistent with Table 5-9; for example, the table shows a "worker" designation along Scoggins Valley Road northeast of the facility, but Figure 7-4 shows "acute only" in this area.
8. Update Section 7.1.1 of the Risk Assessment Work Plan to specify only "non-exempt" TEUs are included – for example, "A Level 3 Risk Assessment will be conducted that includes all *non-exempt* facility TEUs";
9. In Section 8.2, correct the typo: *"As shown in Table 1-2 the maximum predicted excess cancer risk, ~~child~~ and chronic and acute noncancer hazard indices…"*;
10. In Table 8-4 and 8-5: update footnote (4) to note the Maximum Predicted Risk Exposure Location per Significant TEU is shown in Table 8-2 or 8-3; and
11. In Table 8-4 and 8-5: update footnote (3) to note that the acute risk equivalent emission rates are shown in Table 4-6 and 4-7.

Modeling Files

The following minor concerns were identified in the modeling files. DEQ has verified that these items do not impact risk results and will not require that the modeling be re-run at this time; however, please make the corrections the next time Stimson re-assesses risk.

12. The airport elevation for Hillsboro Airport should be 204 feet (the modeling uses 818 feet); and

13. The receptor files used in the acute modeling (”cao_acute.rou” and "cao_acute_susd.rou”, were not provided to DEQ. DEQ confirmed that the results using the receptor file provided (“cao_uer.rou”).

DEQ requests that you submit additional information to complete your Risk Assessment. 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 and answer any questions you may have. Failure to provide additional information, corrections, or updates to DEQ by the deadlines in this letter may result in a violation of OAR 340-245-0030(2).

If you have any questions regarding this letter please contact me directly at (503) 866-9643 or julia.degagne@deq.oregon.gov. I look forward to your continued assistance with this process.

Sincerely,

Julia DeGagné
Cleaner Air Oregon Project Engineer

Enc: Attachment 1: DEQ Startup Modeling
Attachment 2: Reference Updates

Cc: Katie Eagleson, DEQ
J.R. Giska, DEQ
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