



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Agency Headquarters

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5696

FAX (503) 229-6124

TTY 711

June 25, 2025

Georgia-Pacific Toledo LLC
1400 SE Butler Bridge Road
Toledo, OR 97391
Sent via email only

Ann Vorderbrueggen,

On June 5, 2025, DEQ received a request from Georgia-Pacific Toledo LLC (GP Toledo) for a 120-day extension of the deadline for items in DEQ's WWTP letter¹, dated March 24, 2025, and DEQ's non-WWTP letter², dated March 24, 2025.

DEQ may grant an extension based on the criteria set in [OAR 340-245-0030\(3\)](#), which require sources to demonstrate progress towards completing the submittal and show that a delay is necessary for good cause. DEQ understands that GP Toledo has demonstrated progress on responding to the revised Inventory by meeting with DEQ at the facility, and detailing items that can be submitted by the original deadline. Further, DEQ agrees that a delay may be necessary in order for GP Toledo to consolidate source testing, make company decisions regarding the AMRS facility, and compile the extensive amount of data requested by DEQ.

According to GP Toledo, *"the additional time is needed in order to work with EPA to understand the forthcoming ICR testing requests for units also requested to be tested as part of CAO, work with DEQ to develop site specific monitoring plans at the WWT facility, work with stack testing companies on the availability of testing and test methods, and work with AMRS project leads to understand future plans."*

For these reasons, DEQ partially approves GP Toledo's request and grants extensions from the original submittal deadlines, as detailed in Table 1, below. GP Toledo's submittals must be submitted by no later than the approved deadlines provided in Table 1. All other items from DEQ's two March 24, 2025 letters (WWTP and non-WWTP), not noted in Table 1, must be submitted by their previously approved deadlines.

¹ DEQ letter, dated March 24, 2025. Available online:
<https://ormswd2.synergydcs.com/HPRMWebDrawer/RecordView/6907667>

² DEQ letter, dated March 24, 2025. Available online:
<https://ormswd2.synergydcs.com/HPRMWebDrawer/RecordView/6907668>

Table 1: Deadline extension requests and approvals

Item	DEQ Letter	Current Deadline	Approved Deadline	Notes
Specific Comment 1: Sampling plan(s) for the liquid sampling of the WWTP	WWTP	6/26/2025	August 25, 2025	<ul style="list-style-type: none"> ➤ DEQ is requesting that GP Toledo perform the liquid sampling requested in our March 24, 2025, WWTP letter. ➤ DEQ is available to continue discussing setting up an ambient air monitoring program for the WWTPs. See DEQ's information on requirements for ambient air monitoring.
Comments 1 and 12: Source testing of the Advanced Materials Recycling System (AMRS) by July 24, 2025.	Non-WWTP	7/24/2025	Source testing required during next operational period for the AMRS.	<ul style="list-style-type: none"> ➤ The source test plan is due 30 days before source testing. ➤ The source test results report is due within 60 days after the test is completed. ➤ The Inventory must be updated with AMRS fugitive emissions (Comment 12) 60 days following approval of the source test report.
Comment 2: Source testing of the No. 1 and No. 2 Recovery Boiler (BLS) by July 24, 2025.	Non-WWTP	7/24/2025	Conduct testing during EPA testing, if scheduled to occur prior to December 31, 2025. Otherwise, conduct source testing by November 21, 2025.	<ul style="list-style-type: none"> ➤ The source test plan is due 30 days before source testing. ➤ The source test results are due within 60 days after the test is completed.
Comment 3: Source testing of the No. 1, No. 2, and No. 3 Lime Kilns by July 24, 2025.	Non-WWTP	7/24/2025	Conduct testing during EPA testing, if scheduled to occur prior to December 31, 2025. Otherwise, conduct source testing by November 21, 2025.	<ul style="list-style-type: none"> ➤ The source test plan is due 30 days before source testing. ➤ The source test results report is due within 60 days after the test is completed.

Item	DEQ Letter	Current Deadline	Approved Deadline	Notes
Comment 6: Sampling plan(s) for the liquid sampling of the AMRS wastewater discharge by May 26, 2025 (previously extended to June 25, 2025).	Non-WWTP	6/25/2025	Conduct sampling during the next operational period for the AMRS.	<ul style="list-style-type: none"> ➤ The sampling plan is due 45 days before the sampling event. ➤ The sampling results are due within 60 days after the test is completed.
Comment 10b(i), 10b(ii) relating to chemical usage.	Non-WWTP	6/24/2025	October 24, 2025	
Comment 10c: Welding	Non-WWTP			
Comment 10d: Industrial Cooling Towers	Non-WWTP			
Comment 10e: Tank throughput information.	Non-WWTP			
Comment 11: Landfill emissions	Non-WWTP			
Comment 13: Lime Mud Handling System, quartz emissions	Non-WWTP			
Comment 14: Fugitive emissions	Non-WWTP			
Comment 17: NG Boilers	Non-WWTP			

DEQ remains available to meet with GP Toledo or provide feedback via email. Please contact me directly at heather.kuoppamaki@deq.oregon.gov or 503-407-7596, if you have any questions regarding this letter or CAO submittal requirements. I look forward to your continued assistance with this process.

Sincerely,

A handwritten signature in black ink, appearing to read 'H. Kuoppamaki', with a stylized flourish at the end.

Heather Kuoppamaki, P.E.
Cleaner Air Oregon Project Engineer

Cc:

Maria Zufall, Georgia-Pacific
Logan Vaughan, Georgia-Pacific
Micah Joel Leis, Georgia-Pacific
Michael Eisele, DEQ
Zach Loboy, DEQ
Amy DeVita McBride, DEQ
J.R. Giska, DEQ
File