



Georgia-Pacific Toledo LLC  
1400 SE Butler Bridge Road  
Toledo, Oregon 97391

June 5, 2025

Ms. Heather Kuoppamaki  
Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232  
(Sent via email only)

Re: Clean Air Oregon (CAO) Emission Inventory Information Request Extension

Dear Ms. Kuoppamaki,

By two letters dated March 24, 2025, the Oregon Department of Environmental Quality (DEQ) provided a follow-up request to Georgia-Pacific (GP Toledo) requesting additional information pertaining to the CAO Emission Inventory originally submitted on May 27, 2022. The information request required the additional information be submitted by the following dates:

- July 24, 2025 source testing with test plan 45 days prior (June 9, 2025) - Non-WWT letter, Item 1<sup>1</sup>;
- July 24, 2025 source testing, Non-WWT letter, Items 2, 3;
- June 24, 2025, source test plan, Non-WWT letter, Item 4;
- June 25, 2025, updated from May 26, 2025 in email from DEQ on April 21, 2025, sampling plan for AMRS WWT discharge of PFAS, Non-WWT letter, Item 6;
- June 24, 2025, non-WWT letter, Items 7 through 21; and
- June 25, 2025, updated from May 26, 2025 in email from DEQ on April 21, 2025, sampling plan, WWT letter.

GP respectfully submits this extension request as allowed by OAR 340-245-0030(3).

*(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.*

GP Toledo has made substantial efforts to collect and compile the requested information but due to the extent of information still needing to be gathered, GP Toledo is requesting a 120-day extension of the due dates above.

---

<sup>1</sup> Note that a request for extension of this deadline was submitted in an email from Ms. Ann Vorderbrueggen on May 23, 2025.

This 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. In addition, the Toledo Mill is involved in on-going compliance tasks, including TRI submittal, Subpart MM ICR, and day-to-day compliance activities.

To demonstrate that GP is making progress towards responding to the follow-up request, below is a list of items that GP plans to submit by the deadline dates above.

- Item 7, non-WWT letter – corrected activity information for AQ520
- Item 8, non-WWT letter – stack updates
- Item 9, non-WWT letter – Process flow diagram updates
- Item 10a, non-WWT letter – Exempt TEUs
- Item 10b (iii), non-WWT letter, EDS
- Item 15, non-WWT letter – explanation of venting apportionment
- Item 16, non-WWT letter – CEMS and test data for H<sub>2</sub>S
- Item 18, non-WWT letter – turpentine decanter emission factor
- Item 19, non-WWT letter – update engine activity units
- Item 20, non-WWT letter – source questions
- Item 21, non-WWT letter – updates based on permit changes

In addition, GP plans to submit the following items with the above, as requested during the DEQ site visit on May 5-6, 2025:

- Make, model, and specifications of our H<sub>2</sub>S perimeter air monitors on site. We will also include the total number of monitors we have currently on site and our QA/QC plan.
- Copy of current LDAR plan.
- Indication of CAO overlap with required Subpart MM ICR testing.

We look forward to continued collaboration with DEQ throughout the CAO process. Please contact Logan Vaughan at (503) 240-1627 or [logan.vaughan@gapac.com](mailto:logan.vaughan@gapac.com) or Ann Vorderbrueggen at (912) 673-0221 or [Ann.Vorderbrueggen@gapac.com](mailto:Ann.Vorderbrueggen@gapac.com) if you have any questions regarding this extension request.

Sincerely,



Mark E. Carden

Vice President– Georgia-Pacific Toledo LLC

CC: Michael Eisele, DEQ (via email)  
Amy DeVita McBride, DEQ (via email)  
Zach Loboy, DEQ (via email)  
J.R. Giska, DEQ (via email)