Dear Julia DeGagné,

Maul Foster and Alongi, Inc (MFA) is submitting the revised Cleaner Air Oregon (CAO) materials on behalf of Stimson Lumber Company (Stimson). The revised CAO materials are in response to the letter provided to Stimson on September 24, 2025 (response letter), regarding the updated CAO risk assessment submitted with the Construction Air Contaminant Discharge Permit (ACDP) application initially on April 25, 2025 and with revisions on August 5, 2025. The Construction ACDP application is for a proposed sawmill line at Stimson's Forest Grove Complex (the facility) in Gaston, Oregon.

The revised CAO materials contain all the requested changes in the response letter and, generally, do not require additional comment. However, there are two items in the response letter that Stimson and MFA would like to provide clarification on. These items are described below.

2.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.

The calculation workbook, AQ520, and level 3 risk assessment have been updated to reflect the maximum daily and annual potential to emit (PTE) throughputs for all TEUs at the facility excluding those specific to boiler startup (i.e., boiler exhaust through the uncharged ESP (ID **HBLR_MC**) and boiler exhaust through the wet scrubber during startup (ID **HBLR_SCR_SU**). This change was made as startup emissions are now being added to the PTE facility operations. This ensures the facility will have more flexibility with future boiler startup operations. As a result, any comments in the response letter specific to startup throughputs for any other TEUs were not addressed due to the changes requested by Stimson and MFA.

2.c.i.) 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.

The throughputs identified in the AQ520 forms are actually correct at 35,964 ODT/yr and 3,596.4 ODT/yr for these TEUs. The calculation workbook was calculating 35,640 ODT/yr and 3,564 ODT/yr, which was erroneously based on 5,500 hours of operation per year. 35,964 ODT/yr and 3,596.4 should be used as they are reflective of 5,550 hours of annual operation for the hardboard plant. This is consistent with Plant Site Emission Limit basis used in the existing permit. The calculation workbook has been updated to reflect the correct throughputs for these TEUs.