



Oregon

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November 14, 2025

Quinn Burke-Anderson
Stimson Lumber Company
49800 SW Scoggins Valley Rd
Gaston, OR 97119-9132
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 October 24, 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 initial comments on June 25, 2025. Stimson provided revised CAO materials on August 5, 2025. DEQ provided additional comments on September 24, 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 **December 3, 2025**.

Emissions Inventory

1. TEUs RESIN1, RESIN2, RESIN3, and RESIN4:
 - a. Update the annual emissions calculations in Appendix A to the Construction ACDP ("Emissions Calculations Workbook") to use a consistent vapor pressure for the VOC calculation and the TAC speciation; that is, use either the vapor pressure at 35 degrees Celsius or 25 degrees Celsius for both; and
 - b. Incorporate the above correction into the AQ520 forms and the Risk Assessment results tables.
2. Update the CAO AQ520 forms for the Multiclone (MC) and Scrubber SU scenarios as follows:
 - a. Refiner stack (TEU H-RF12_STK_P):
 - i. In Worksheet 3, update the daily requested potential to emit (RPTE) to be consistent with Appendix A – the current values in the AQ520 values do not include the control efficiency. Note: the modeled risk equivalent emission rates are correct, so AERMOD does not require updating.

- ii. In Worksheet 2, update the units to be in “ODT” (oven dried tons) instead of Mbdft (thousand board feet).
- b. Update the Reference/Notes columns as follows:
 - i. H-BLR_ESP: Hydrogen fluoride (CASRN 7664-39-3): “NCASI Technical Bulletin 1050 (September 2018). Emission factor for wood-fired boiler with dry control device”; and
 - ii. H-BLR_SCR:
 - 1. Manganese (CASRN 7439-96-5), thallium (CASRN 7440-28-0), and zinc (CASRN 7440-66-6): “NCASI Technical Bulletin 1050 (September 2018). Emission factor for wood-fired boiler with wet scrubber control”;
 - 2. Mercury (CASRN 7439-97-6) and hydrochloric acid (CASRN 7647-01-0): “Boiler MACT compliance Source Test Reports dated November 5, 2019 and December 1, 2022. Representative of the average between the two 3-run averages from the scrubber outlet”;
 - 3. Vanadium (CASRN 7440-62-2) and molybdenum trioxide (CASRN 1313-27-5): “NCASI Technical Bulletin 1050 (September 2018). Emission factor for wood-fired boiler with ESP or fabric filter control”;
 - 4. Chlorine (CASRN 7782-50-5): “AP-42 Chapter 1 (April 2022), Table 1.6-3, “Emission Factors for Speciated Organic Compounds, TOC, VOC, Nitrous Oxide, and Carbon Dioxide from Wood Residue Combustion”;
 - 5. Carbon tetrachloride (CASRN 56-23-5) and xylene (CASRN 1330-20-7): “NCASI Technical Bulletin 1050 (September 2018). Emission factor for wood-fired boiler”; and
 - 6. Hydrogen fluoride (CASRN 7664-39-3): “NCASI Technical Bulletin 1050 (September 2018). Emission factor for wood-fired boiler with wet control device”;
 - iii. H-BLR_MC: Molybdenum trioxide (CASRN 1313-27-5): “AP-42 Chapter 1 (April 2022), Table 1.6-4, “Emission Factors for Trace Elements from Wood Residue Combustion.”
- 3. If requesting exemption from public disclosure for the native Excel version of Attachment A, submit a redacted version (such as a PDF file) with the confidential information removed or redacted.
- 4. In Appendix A, update Table 27 footnote (11) to cite the correct source test date for the first Scrubber H-S5 source test (August 5, 2010).

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

- 5. RESIN1, RESIN2, and RESIN3: Update the acute risk equivalent emission rates (REER) in the AERMOD modeling and the Risk Assessment Report tables to be consistent with the daily emissions in the AQ520 forms and the risk-based concentrations in Table 7-1. DEQ calculates the following total REERs:
 - a. RESIN1: 0.0001407
 - b. RESIN2: 0.0001538
 - c. RESIN3: 0.0001546
- 6. Make the following updates to the Modeling Protocol and Risk Assessment Report:
 - a. Update Table 1-1 (AAQS Results Summary) to be consistent with the AAQS modeling report submitted with the Title V – Criteria Pollutant NAAQS Analysis on 4/23/2025 and completed on 7/8/2025 in Your DEQ Online. The approved total PM_{2.5} impact is 20.5 µg/m³.

- b. Correct Tables 4-3 and 4-4 to show the daily emission rates and REERs for all Model IDs (currently the tables are showing annual rates for S_CYC, SM_CHP, LSP, PVUV_STK, PVUV_FUG, RF12_RV, RF12, STK, and RESIN1-4).
- c. Update Tables 8-3 and 8-5 as follows for consistency with the AERMOD output files:
 - i. For acute risk from the “Scrubber SU” scenario:
 - 1. Exposure location with highest acute noncancer risk: 485,080 (Easting) and 5,035,162 (Northing); and
 - 2. Maximum acute hazard index (unrounded): 1.26308.
- d. In the Modeling Protocol and Risk Assessment Report, review and update references to the daily TAC emission rate table as needed – this is sometimes listed as Table 4-4 but should be Table 4-3.
- e. The document footers in the Tables section of the Modeling Protocol and Risk Assessment Report indicate “CONFIDENTIAL” – if exemption from public disclosure is not being requested for the PDF document, remove the “CONFIDENTIAL” designation from the PDF.

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

Cc: Patty Jacobs, DEQ
J.R. Giska, DEQ
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