



Oregon

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December 12, 2025

Quinn Burke-Anderson
Stimson Lumber Company
49800 SW Scoggins Valley Rd
Gaston, OR 97119-9132
Sent electronically only

Quinn Burke-Anderson,

Stimson Lumber Company (Stimson) in Gaston, OR (Source Number 34-2066) was called in to the Cleaner Air Oregon (CAO) program on July 2, 2020. DEQ approved Stimson's original risk assessment on August 5, 2024. Stimson submitted revised CAO materials on April 23, 2025 (YDO Submittal ID 66944), concurrently with a Construction ACDP Application for Title V Permit No. 34-2066-TV-01, in which Stimson proposed to expand operations with the construction of a new sawmill. DEQ provided Stimson with comments on the CAO submittals on June 25, 2025, September 24, 2025, and November 14, 2025. Stimson provided revised CAO submittals on August 5, 2025, October 24, 2025, and November 21, 2025.

DEQ has completed its review of the revised CAO Emissions Inventory, Modeling Protocol, Risk Assessment Work Plan, and Level 3 Risk Assessment submitted on November 21, 2025. In accordance with [Oregon Administrative Rule \(OAR\) 340-245-0050\(1\)](#), DEQ approves these documents with the following minor updates:

Emissions Inventory

1. The resin tank (TEUs RESIN1, RESIN2, RESIN3, and RESIN4) annual emissions calculations have been updated to use the material vapor pressure at 20 degrees Celsius when calculating the vapor mole fraction of each toxic air contaminant emitted;
2. The emission factor reference for xylene (CASRN 1330-20-7) for TEU H-BLR_SCR has been updated to "NCASI Technical Bulletin 1050 (September 2018). Emission factor for wood-fired boiler";
3. The emission factor reference for polychlorinated biphenyls (PCBs; CASRN 1336-36-3) for TEUs H-BLR_ESP, H-BLR_SCR, and H-BLR_SCRU_SU has been updated to "Equal to sum of speciated PCB compounds"; and
4. The emission factor reference for chlorine (CASRN 7782-50-5) for TEU H-BLR_MC has been updated to "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."

Risk Assessment

5. The final acute noncancer hazard index for the scrubber startup (Scrubber SU) scenario is 1.26 at

the UTM 485,080 m (X) and 5,035,162 m (Y). The maximum location of the acute noncancer hazard index for the multi-clone startup (MC SU) scenario is at the UTM 485,080 m (X) and 5,035,112 m (Y). These values vary slightly from those presented in the report but were confirmed in the modeling output files.

DEQ has confirmed that these updates do not change the calculated rounded risk and is not requiring updates to the modeling or Risk Assessment report at this time. However, these changes must be incorporated into any future risk reassessments. Items 1 through 4 above have been updated in the attached, approved versions of the CAO Emission Inventory (AQ520) forms. Please review these and contact me if there are any inaccuracies.

The resulting Residential Excess Cancer Risk of 25.4 (rounded to 25), Residential Chronic Noncancer Hazard Index of 0.92 (rounded to 1), and Acute Noncancer Hazard Index of 1.47 (rounded to 1), as determined by the Risk Assessment, exceed the Source Permit Risk Action Level for existing sources. [\[OAR 340-245-8010, Table 1\]](#) Other risk values for this facility do not exceed the Source Permit Level. This means that Source Risk Limits will be required in the permit to limit the risk from toxic air contaminant emissions from this facility.

Stimson Lumber Company has completed the AQ502 CAO Permit Modification form and paid the required fees. The next step in the process is for DEQ to draft the Toxic Air Contaminant Permit Addendum (TACPA) and provide you with the opportunity to review and comment.

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: Revised AQ520 Form: Multicloner (MC) Startup Scenario
Revised AQ520 Form: Scrubber Startup Scenario

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