



December 24, 2025

Delivery via YDO:

Julia DeGagné, Cleaner Air Oregon Project Engineer
Oregon Department of Environmental Quality
Julia.Degagne@deq.oregon.gov

Re: Hampton Lumber Mills, Inc.—Tillamook Lumber Company
Cleaner Air Oregon Emissions Inventory Extension Request

Dear Julia:

Hampton Lumber Mills, Inc. (dba Tillamook Lumber Company) (“Hampton Tillamook”) is writing with respect to our ongoing work to comply with the Cleaner Air Oregon (“CAO”) program. Since receiving a letter from the Department of Environmental Quality (“DEQ”) on November 14, 2025, requesting additional information, corrections, and updates, Hampton Tillamook has made significant progress in revising the CAO Air Toxics Emission Inventory (“EI”). That progress is detailed below. The purpose of this letter is to request a short extension to DEQ’s deadline of January 13, 2026, to complete and submit a revised EI to DEQ. Our requested new deadline is January 30, 2026. Our request is being made under OAR 340-245-0030(3), which states:

(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.*

Hampton Tillamook has made significant progress in completing the revisions to the EI requested by DEQ. Specifically, Hampton Tillamook has been working on the following (numbers correspond to DEQ’s November 14, 2025, letter):

1. Gathering and evaluating boiler startup and shutdown information to include separate scenarios.
2. Updating emission factors for the boiler.
3. Discussing and evaluating batch kiln emissions with the National Council for Air and Stream Improvement (“NCASI”).
4. Developing emission estimates from wind erosion of the ash pile and revising emissions from ash transfers.
5. Developing emission estimates from unpaved roads in the ash handling areas.

6. Adding welding emissions using the San Diego Air Pollution Control District's methodology.
7. Adding emissions for plasma cutting, similar to torch cutting, based on the same composition.
8. Revising torch cutting emissions based on the less than or equal to ("≤") approach identified by the DEQ.
9. Revising maintenance shop activity emissions to different areas.
10. Evaluating methanol emissions from the wood chipper.
11. Requesting additional information on End Shield Concentrate and Workhorse II Toxic Air Contaminant ("TAC") composition from the manufacturer.
12. Revising miscellaneous chemical emissions based on TAC composition changes.
13. Adding diesel tank information as an Exempt Toxics Emission Unit ("TEU").
14. Adding Exempt TEU information to the worksheet.
15. Populating worksheet 3 Column G.

Hampton Tillamook is requesting this extension because we need additional time to:

- Obtain information from NCASI regarding batch kiln emissions and how they relate to a 24-hour day. DEQ has suggested a conservative approach of assuming all batch emissions are released in 24 hours, and this approach may not be appropriate. Hampton Tillamook has engaged NCASI to assist with this evaluation. We have not received their response yet.
- Obtain TAC composition information from KOP-Coat. They have been slow to respond to requests, and Hampton Tillamook is hoping additional time will improve the likelihood of a useful response.

The original deadline included multiple federal holiday periods, for Thanksgiving, Christmas, and New Year's, which has significantly impacted responsiveness to our requests. Hampton Tillamook is committed to providing a complete and accurate inventory and requests additional time to ensure it can do so. This timely request is being submitted more than 15 days prior to the submittal deadline.

Thank you for considering our request. In response, or if you have other questions, please contact Amy Peccia, Hampton's Environmental Manager, at AmyPeccia@hamptonlumber.com or by phone at (503) 876-1309.

Sincerely,

Ryan Pettit
 Mill Manager
 Hampton Lumber Mills, Inc.—Tillamook Lumber Company
Certified and submitted via YDO

cc: Amy Peccia, Hampton Lumber Mills
 Travis Quarles, Bridgewater Group