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December 19, 2025

Biomass One, L.P.
2350 Ave G
White City, OR 97503
Sent electronically only

Kurt Lumpkin,

DEQ called in the Biomass One, L.P. (Biomass One) facility in White City, OR to the Cleaner Air Oregon (CAO) program on April 26, 2024. DEQ received the submittal of the CAO Emissions Inventory (Inventory) for Biomass One on December 20, 2024. In accordance with Oregon Administrative Rule (OAR) 340-245-0030(2), DEQ issued a written request on July 25, 2025, requiring additional information and a revised Inventory to be submitted by September 8, 2025. Biomass One requested an extension to DEQ's deadline and submitted their response to DEQ's request in two parts. Biomass One submitted supporting information on September 5, 2025, and the revised Inventory was received on October 6, 2025 (Your DEQ Online [YDO] submittal 71148).

DEQ has reviewed the Inventory and identified additional updates that are needed before approval. In accordance with OAR 340-245-0030(4)(b), DEQ is providing Biomass One with a deadline for submittal of a revised Inventory. Please submit the information specified below by **45 days** after the issuance date of this letter, or **February 2, 2026**.

General Comments

1. Trimethylbenzene: Numerous materials used at Biomass One contain trimethylbenzene (CASRN 25551-13-7). This CASRN is for a mixture of trimethylbenzene isomers. While CASRN 25551-13-7 is not included on the TAC priority list under OAR 340-247-8010 Table 1, the three individual trimethylbenzene isomers are. Therefore, trimethylbenzene should be reported as 1,2,3-trimethylbenzene (CASRN 526-73-8) in the AQ520 form so that risk is assessed using the appropriate risk-based concentration. DEQ has addressed required updates to the Inventory or supporting calculations in the proceeding "Specific Comments" section.

2. Biomass One conducted an exemption analysis for the materials used in the Maintenance TEUs (TEU-061, TEU-062, and TEU-063) which was submitted with the December 20, 2024, Inventory. Based on this analysis, Biomass One has shown quantities of TACs from materials is below thresholds set by DEQ in Appendix A of the "Cleaner Air Oregon Exempt TEU Reporting" document. Materials which contain only TACs emitted below reporting thresholds for the TEU, may be considered exempt. If a material contains any TACs that are above a reporting threshold in Appendix A, all TACs from this material must be reported. DEQ has addressed required updates to the Inventory or supporting calculations in the proceeding "Specific Comments" section.

3. Crystalline Silica: The CAS registry number (CASRN) of 7631-86-9 is for silica of both amorphous and crystalline form. However, at this time only crystalline silica (of respirable size) is a listed toxic air contaminant (TAC). The following silica materials are of the crystalline form:

quartz (CASRN 14808-60-7), cristobalite (CASRN 14464-46-1), and tridymite (CASRN 15468-32-3). Materials under these CASRNs should be evaluated as crystalline silica and are potentially reportable as "silica, crystalline (respirable)" (CASRN 7631-86-9) for CAO. DEQ has reviewed Safety Data Sheets (SDSs) for materials used at Biomass One and found materials which contain crystalline silica. DEQ has addressed required updates to the Inventory or supporting calculations in the proceeding "Specific Comments" section.

4. DEQ has prepared a copy of the AQ520 form with some of the below edits incorporated into Worksheet 3. The workbook is included as Attachments A and B. The version of the AQ520 form included as Attachment A includes highlighting to call attention to cells where edits have been incorporated by DEQ or should be incorporated by Biomass One. Note, DEQ has highlighted cells with additions or corrections incorporated by DEQ in green. DEQ has highlighted cells which require an edit or correction to be addressed by Biomass One in yellow. The version of the AQ520 form included as Attachment B also includes edits from DEQ, but there is no highlighting. When evaluating SDS composition data included as a range on the SDS, DEQ has used the average of the range, but Biomass One may elect to use the maximum of the range if desired.

Specific Comments

Revised Inventory: Submit to DEQ a revised AQ520 Inventory Form, along with all supporting calculations in Excel format, as well as all information required under OAR 340-245-0040(4). Include the following updates to the AQ520 form:

1. Biomass One incorporated updates to the following throughputs or usage rates in Worksheet 2 of the revised Inventory submitted on October 6, 2025. These changes were not documented in the submittal materials. Confirm that these changes were incorporated intentionally and if not revise as needed.
    a. For the Storage Pile toxics emissions unit (TEU) (EU-028), Annual PTE and both Actual and PTE daily throughputs (green tons handled); and
    b. For the Horizontal Grinder TEU (TEU-064), all throughputs (green tons handled).
2. North Boiler (TESU EU-011): Emission factors for chlorine (CASRN 7782-50-5) and hydrochloric acid (CASRN 7647-01-0) differ from the emission factors provided by DEQ in an August 20, 2025, correspondence. Please confirm how Biomass One developed these emission factors and correct if in error.
3. South Boiler (TESU EU-012): Emission factors for chlorine (CASRN 7782-50-5) and hydrochloric acid (CASRN 7647-01-0) differ from the emission factors provided by DEQ in an August 20, 2025, correspondence. Please confirm how Biomass One developed these emission factors and correct if in error.
4. Storage Pile (TEU EU-028): On Worksheet 2, the Actual maximum daily throughput for this TEU is less than the Actual annual throughput divided by 365 days. Refine this throughput to reflect a maximum daily throughput for the 2023 calendar year.
5. Maintenance Shop Welding (TEU TEU-054): Per General Comment 4, DEQ has incorporated most of the below edits to Worksheet 3 in Attachments A and B.
    a. TESU TEU-054_E7018: Include emissions of hexavalent chromium (CASRN 18540-29-9). Use an emission factor of 0.0033 lb/Mlb rod consumed for SMAW E7018 electrodes.

b. TESU TEU-054_E6011: Include emissions of hexavalent chromium (CASRN 18540-29-9). Use an emission factor of 0.00275 lb/Mlb rod consumed for SMAW E6011 electrodes.
c. TESU TEU-054_E70S: Include emissions of hexavalent chromium (CASRN 18540-29-9). Use an emission factor of 0.00005 lb/Mlb rod consumed for GMAW E70S electrodes.
d. TESU TEU-054_E71T:
    i. On Worksheet 2, the Actual maximum daily usage for the FCAW E71T electrode is less than the Actual annual throughput divided by 365 days. Refine this throughput to reflect a maximum daily electrode usage for the 2023 calendar year.
    ii. Include emissions of hexavalent chromium (CASRN 18540-29-9). Use an emission factor of 0.0002 lb/Mlb rod consumed for FCAW E71T electrodes.

6. Main Shop Material Usage (TEU-061): Per General Comment 4, DEQ has incorporated most of the below edits or otherwise noted where edits are required in the revised AQ520 form included as Attachments A and B. For SDS composition data provided as a range, DEQ has used the average of the range. Biomass One may elect to use the maximum of the range if desired.
    a. Remove the TESU assignments for the individual materials listed under this TEU on Worksheets 4 and 5. Usage of multiple materials can be accounted for under a single TEU.
    b. On Worksheet 5, include an appropriate reference for the data used to develop the TAC emission estimates. For example, "Composition from material's SDS. [Average/Maximum] of range used." From review, Biomass One has used the maximum of the SDS composition range, but revise wording of the reference as appropriate.
    c. Per General Comment 1, Biomass One must report emissions of trimethylbenzene (CASRN 25551-13-7) as 1,2,3-trimethylbenzene (CASRN 526-73-8). Biomass One has included each materials' content of trimethylbenzene in Worksheet 5, however, it has been reported inconsistently as different isomers, using both CASRNs 108-67-8 and 95-63-6. From DEQ's review of SDSs, the following materials contain trimethylbenzene:
        i. Krylon Industrial Rust Tough rust preventative enamel (gloss black);
        ii. Krylon Industrial Tough Coat Advanced protective semi-gloss enamel (gloss black);
        iii. Krylon Industrial Tough advanced protective high gloss safety enamel (safety/osha red); and
        iv. Krylon Industrial Acrylic-quik laquer paint (hunter green).
    d. Report ethylene glycol monopropyl ether (CASRN 2807-30-9) emissions from the following materials:
        i. Krylon Industrial Rust Tough rust preventative enamel (gloss black);
        ii. Krylon Industrial Tough Coat Advanced protective semi-gloss enamel (gloss black);
        iii. Krylon Industrial Tough Coat Advanced protective high gloss enamel (industrial yellow);
        iv. Krylon Industrial Tough advanced protective high gloss safety enamel (safety/osha red); and
        v. Krylon Industrial Acrylic-quik laquer paint (hunter green).
    e. Report propylene glycol monomethyl ether acetate (CASRN 108-65-6) emissions from the following materials:
        i. Krylon Industrial Rust Tough rust preventative enamel (gloss black);

ii. Krylon Industrial Tough Coat Advanced protective high gloss enamel (gloss white); and
iii. Krylon Industrial Tough Coat Advanced protective semi-gloss enamel (gloss black).

f. Report 1,2-dichlorobenzene (CASRN 95-50-1) emissions from the "Marvel Mystery Air Tool Oil" material.
g. Report acetone (CASRN 67-64-1) emissions from the "Krylon Industrial Tough advanced protective high gloss safety enamel (safety/osha red)" material.
h. "Krylon Industrial Tough Coat Advanced protective ultra primer (gray": The TAC composition for this material in Worksheet 5 differs significantly from the information in the material's SDS provided to DEQ. Review the material's SDS and revise TAC composition as appropriate.

7. Truck Shop Material Usage (TEU-062): Per General Comment 4, DEQ has incorporated most of the below edits or otherwise noted where edits are required in the revised AQ520 form included as Attachments A and B. For SDS composition data provided as a range, DEQ has used the average of the range. Biomass One may elect to use the maximum of the range if desired.
    a. Remove the TESU assignments for the individual materials listed under this TEU on Worksheets 4 and 5. Usage of multiple materials can be accounted for under a single TEU.
    b. On Worksheet 4, populate the "Emissions Type" and "Stack or Fugitive ID" columns for this TEU.
    c. On Worksheet 5, include an appropriate reference for the data used to develop the TAC emission estimate. For example, "Composition from material's SDS. [Average/Maximum] of range used." From review, Biomass One has used the maximum of the SDS composition range, but revise wording of the reference as appropriate.
    d. Per General Comment 1, Biomass One must report emissions of trimethylbenzene (CASRN 25551-13-7) as 1,2,3-trimethylbenzene (CASRN 526-73-8). Biomass One has included a materials' content of trimethylbenzene in Worksheet 5, however, it has been reported inconsistently as different isomers, using both CASRNs 108-67-8 and 95-63-6. From DEQ's review of SDSs, the "Slip Plate Greaseless Lubrication" material contains trimethylbenzene.
    e. Kimball Midwest Battery Cleaner 80-473: Report emissions of the following TACs from this material:
        i. Ethylene glycol monobutyl ether (CASRN 111-76-2); and
        ii. Ethylene glycol (CASRN 107-21-1).
    f. Lawson High Solids Paint 1509225:
        i. This material is listed under both this TEU and the Exempt TEU for the Truck Stop. Update Worksheet 4 to include usage of this material under a single TEU.
        ii. Report emissions of the following TACs from this material:
            1. Acetone (CASRN 67-64-1);
            2. Barium (CASRN 7440-39-3);
            3. Ethylene glycol monopropyl ether (CASRN 2807-30-9); and
            4. Methyl isobutyl ketone (CASRN 108-10-1).
    g. Slip Plate Greaseless Lubrication: This material contains quartz (CASRN 14808-60-7). Per General Comment 3, report all forms of crystalline silica, including quartz as crystalline silica (CASRN 7631-86-9).

8. Grinder Onsite Usage (TEU-063): Per General Comment 4, DEQ has incorporated most of the below edits or otherwise noted where edits are required in the revised AQ520 form included as Attachments A and B. For SDS composition data provided as a range, DEQ has used the average of the range. Biomass One may elect to use the maximum of the range if desired.
    a. Remove the TESU assignment for the individual material listed under this TEU on Worksheets 4 and 5.
    b. On Worksheet 4, populate the "Emissions Type" and "Stack or Fugitive ID" columns for this TEU.
    c. On Worksheet 5, include an appropriate reference for the data used to develop the TAC emission estimates. For example, "Composition from material's SDS. [Average/Maximum] of range used." From review, Biomass One has used the maximum of the SDS composition range, but revise wording of the reference as appropriate.
    d. OTR Non-Flammable Brake Parts Cleaner: The SDS for this material lists the tetrachloroethene (CASRN 127-18-4) content as "≥95" percent by weight, which means the range of content is between 95 and 100 percent. Revise the Inventory to assume either the average content of 97.5 percent or maximum content of 100 percent for tetrachloroethene.

9. Main Shop Exempt Material Usage TEU: Per General Comment 4, DEQ has incorporated most of the below edits or otherwise noted where edits are required in the revised AQ520 form included as Attachments A and B.
    a. Create a new TEU for exempt material usage at Main Shop, such as "TEU-061 Exempt."
    b. Remove the TESU assignments for the individual materials listed under this TEU on Worksheet 4. Usage of multiple materials can be accounted for under a single TEU.

10. Truck Shop Exempt Material Usage TEU: Per General Comment 4, DEQ has incorporated most of the below edits or otherwise noted where edits are required in the revised AQ520 form included as Attachments A and B.
    a. Create a new TEU for exempt material usage at Truck Shop, such as "TEU-062 Exempt."
    b. Remove the TESU assignments for the individual materials listed under this TEU on Worksheet 4. Usage of multiple materials can be accounted for under a single TEU.

11. Cooling Towers: Review of SDSs identified several materials used in the cooling tower recirculation water contain TACs. Biomass One has provided additional details on the intended use of these materials and usage rate information for the BromoChlor material. Based on the conditions of use of these materials and the low target concentrations, DEQ has approved use of these materials as an Exempt TEU for the purposes of CAO. Exempt TEUs must be listed in Worksheet 4, but there is no requirement to include usage and/or waste rates for the materials and they can be excluded from Worksheet 5 as you do not need to estimate emissions for Exempt TEUs. Include the following materials under a Cooling Tower TEU on Worksheet 4 but note as exempt:
    a. BromoChlor;
    b. Columbia Water Technology 2480;
    c. Columbia Water Technology 5396TR; and
    d. Sulfuric Acid.

DEQ is requesting that you submit additional information to complete your Inventory. 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 with you and answer any questions you may have. Failure to provide additional information, corrections, or updates to DEQ by the deadlines above may result in a violation of OAR 340-245-0030(4)(b).

If you have any questions regarding this letter, please contact me directly at (971) 300-3653 or amy.devita-mcbride@deq.oregon.gov. I look forward to your continued assistance with this process.

Sincerely,

Amy DeVita-McBride

Amy DeVita-McBride
CAO Project Engineer

Enc: Attachment A: DEQ Revisions to AQ520 Form with highlighting (Excel File)
Attachment B: DEQ Revisions to AQ520 Form without highlighting (Excel File)

Cc: Mark Labart, Biomass One, L.P.
Beth Ryder, Trinity Consultants
Jonathan Wright, DEQ
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