



Oregon

Tina Kotek, Governor

Department of Environmental Quality
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December 3, 2025

JB Wood Recyclers, LLC
6620 South Pacific Highway West
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Sent electronically only

Brandon Marr,

On July 31, 2025, DEQ approved the Emissions Inventory, Modeling Protocol, Risk Assessment Work Plan and Risk Assessment that were submitted on June 24, 2025. Before the permit modification was issued, revised documents were submitted to DEQ with increases in material throughputs.

DEQ has completed its review of the Cleaner Air Oregon (CAO) Emissions Inventory, Modeling Protocol, Risk Assessment Work Plan, and Level 3 Risk Assessment (Assessment) all submitted on November 26, 2025, for the proposed changes to the facility in Monmouth, OR, which were submitted in accordance with [OAR 340-245-0030](#), [OAR 340-245-0050\(2\)](#), and [OAR 340-245-0100\(8\)](#). DEQ approves the Emissions Inventory, Modeling Protocol, Risk Assessment Work Plan and Risk Assessment with the following comments:

1. All childcare centers, daycares, and schools within the receptor grid must be assessed as child exposure by either adding discrete receptors to the analysis or analyzing the appropriate gridded receptors as child, resident or worker, and acute as applicable. DEQ has determined that at least twelve child exposure locations were not properly identified, including several that have a higher unrounded risk than the receptor identified in the risk assessment. The highest child cancer and chronic noncancer risk of all DEQ-identified child receptors occurs at the receptor nearest Monmouth Montessori School (UTM X, Y: 482401.19, 4966194.00). However, the risk at this exposure location does not exceed the Source Permit Level.
2. Every residential exposure location (i.e., house) must be assessed as residential. For future submittals, perform a comprehensive search for houses, particularly within Exclusive Farm Use zoning, and assess those houses as residential. Some examples of house locations that must be assessed as residential and are currently assigned as worker:
 - a. South and southeast of the facility on Stapleton Road
 - b. East of the facility along Talmadge Road
 - c. South of the facility near the intersection of Helmick Road and Parker Road
3. Receptors within the city of Dallas, OR must be assessed based on local zoning in addition to acute.

The comments noted above do not change the rounded risk reported in the Risk Assessment. Therefore, DEQ will not require JB Wood to resubmit the Level 3 Risk Assessment Report. Instead, a table showing the unrounded risk at the highest child receptor identified by DEQ and maps showing additional DEQ identified child and residential receptors is included as an Attachment to this letter. However, any future submittals for this facility must include the aforementioned items, or applicable if exposure locations have changed.

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The resulting Residential Excess Cancer Risk of 7.2 rounded to 7, Nonresidential Worker Excess Cancer Risk of 5.7 rounded to 6, and Acute Risk of 1.3 rounded to 1, as determined by the Assessment for this facility, are above the Community Engagement Level for new sources [[OAR 340-245-8010, Table 1](#)]. This means that source risk limits will be required in the permit to limit the risk from toxic air contaminant emissions from this facility. All other risk values reported for this facility are below the Source Permit Level.

JB Wood has completed the AQ502 CAO Permit Modification form and paid the required fees. The next step in the process is for DEQ to modify the Air Contaminant Discharge (ACDP) permit and provide you with the opportunity to review and comment.

Please contact Thomas Rhodes (503.869.0054, thomas.rhodes@deq.oregon.gov) if you have any questions regarding the CAO program requirements. We look forward to your continued assistance with this process.

Sincerely,

Thomas RHODES

Thomas Rhodes
CAO Source Test Coordinator

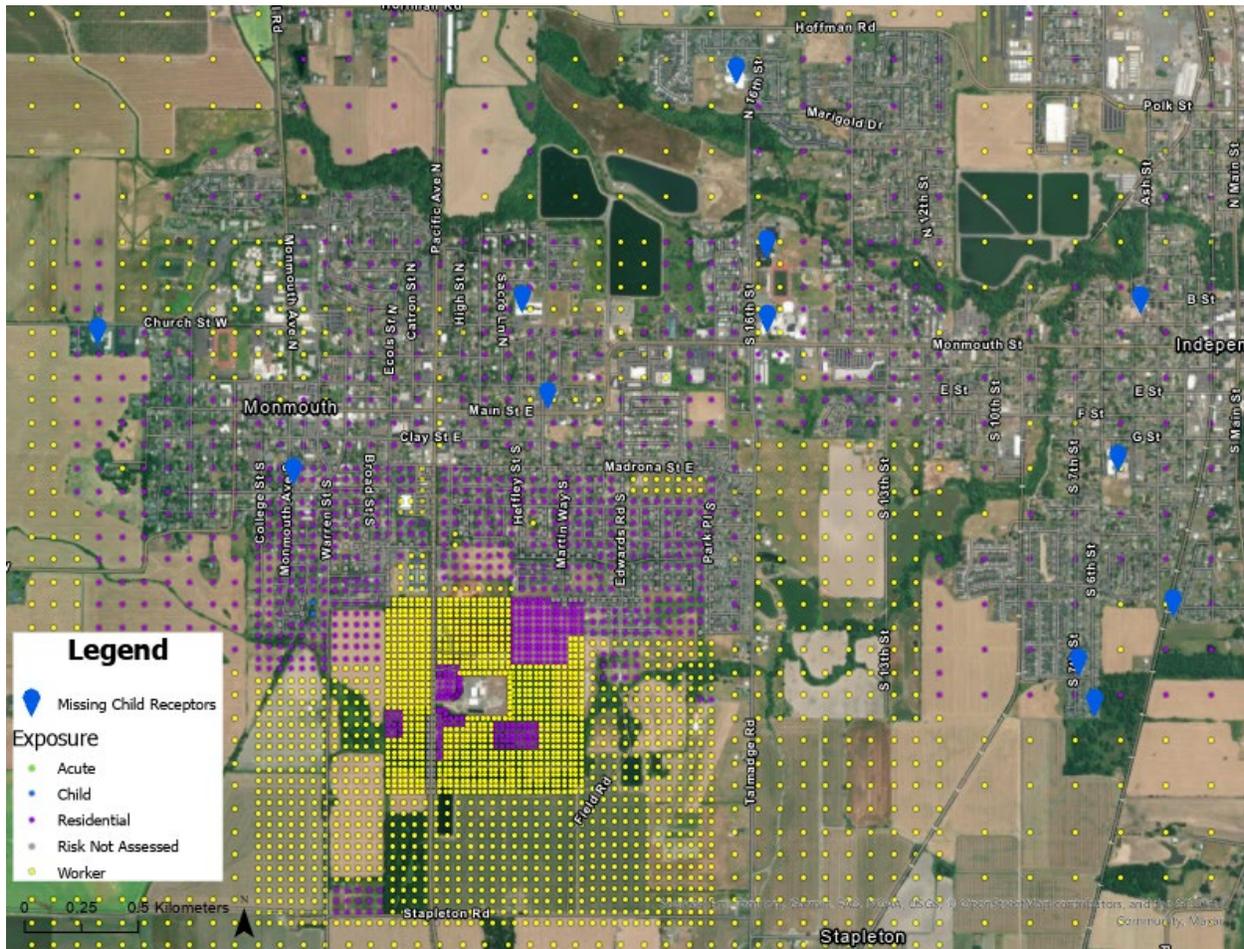
Enc: Attachment:

Cc: J.R. Giska, DEQ
Peter Susi, DEQ
File

Adjusted Chronic Child Cancer and Noncancer Risk:

Risk Scenario	Unrounded Reported Risk (Joy4 Kids Child Care)	Unrounded DEQ-identified risk (Monmouth Montessori School)
Chronic – Child Cancer	0.007808	0.01992
Chronic – Child Noncancer	0.001517	0.004718

DEQ-Identified Child Exposure Locations:



DEQ-Identified Residential Exposure Locations:

