



# Oregon

Tina Kotek, Governor

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October 30, 2025

Mutual Materials Company  
2300 SE Hogan Rd  
Gresham, Oregon 97080  
*Sent via email only*

James Smith,

DEQ called in the Mutual Materials Company (Mutual Materials) in Gresham, OR to the Cleaner Air Oregon (CAO) program on April 26, 2024. DEQ received the submittal of the CAO Emissions Inventory (Inventory) for Mutual Materials on July 25, 2024. In accordance with Oregon Administrative Rule ([OAR 340-245-0030\(2\)](#)), DEQ issued a written request on November 25, 2024, requiring additional information and a revised Inventory to be submitted by December 20, 2024. Mutual Materials submitted a revised Inventory on December 20, 2024.

On November 18, 2024, DEQ's Northwest Region Air Quality Division issued a request under OAR, chapter 340, division 214, requiring Mutual Materials to provide additional information on potential total fluorides emissions from the brick drying kiln and to conduct source testing on the brick drying kiln for total fluorides and HF emissions. Mutual Materials completed the source testing on February 19, 2025, and submitted the source test report for DEQ review on April 18, 2025.

Mutual Materials contacted DEQ on June 3, 2025, indicating their decision to shut down the brick drying operations at their facility and transition exclusively to concrete paver production. DEQ and Mutual Materials met on July 24, 2025, to discuss permitting options for the concrete paver operations and the implications for the CAO existing source call-in process. On July 31, 2025, DEQ requested updated criteria pollutant emissions for the concrete paver operations, due no later than August 30, 2025. An updated criteria pollutant emissions inventory and cover letter detailing the future site operations was submitted by Mutual Materials on August 29, 2025.

DEQ and Mutual Materials met on September 26, 2025, to discuss the continuation of the CAO existing source call-in process. Mutual Materials indicated their intent to continue the CAO RA process with just the concrete paving activities.

The facility is still considered an existing source under CAO and remains subject to the submittal deadlines under [OAR 340-245-0030\(1\)](#). Therefore, the next step in this process is to submit a revised Inventory by **November 25, 2025**.

Since DEQ has transitioned to using Your DEQ Online (YDO) for submittals, Mutual Materials must start a "CAO - Existing Source Risk Assessment Application" in YDO so that future submittals can be made through this system.

DEQ requests 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

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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 503-913-6658 or [Katie.Eagleson@deq.oregon.gov](mailto:Katie.Eagleson@deq.oregon.gov), and I look forward to your continued assistance with this process.

Sincerely,



Katie Eagleson, PE  
Air Toxics Permitting Engineer

Cc: Joe Taff, Mutual Materials Company  
José Márquez, Mutual Materials Company  
Leslie Riley, Maul Foster & Alongi, Inc.  
Stephen Wozab, DEQ  
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