



# Oregon

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March 10, 2026

Cabinetworks Group  
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*Sent electronically only*

John Hamlin,

DEQ called in Cabinetworks Group (Cabinetworks) in Independence, OR to the Cleaner Air Oregon (CAO) program on August 29, 2024. DEQ received the submittal of the CAO Emissions Inventory (Inventory) for Cabinetworks on November 26, 2024 (Your DEQ Online Submittal ID 63519). In accordance with [Oregon Administrative Rule \(OAR\) 340-245-0030\(2\)](#), DEQ issued a written request on February 20, 2025, requiring additional information and a revised Inventory to be submitted by April 22, 2025. Cabinetworks submitted a revised Inventory on April 28, 2025. DEQ issued a written request on September 3, 2025, requiring additional information and a revised Inventory which Cabinetworks submitted on November 17, 2025.

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 Cabinetworks with a revised deadline for submittal of a revised Inventory. Please submit the information specified below by **59 days** after the issuance date of this letter, or **May 8, 2026**.

## General Comments

1. Emission Unit Designations: Toxic Emission Units (TEUs) in the Inventory should match the emission units (EUs) in Cabinetworks' Title V Operating Permit (permit) where appropriate. Unless Cabinetworks would like to redefine the EUs in the permit, they should update the TEU designation to be consistent with the permit. DEQ has addressed required updates to the Inventory or supporting calculations in the proceeding "Specific Comments" section.
2. Short-term variability: Cabinetworks has assumed the average annual in estimating maximum daily throughput or usage rate for the PTE basis. DEQ requires modeling of the worst-case maximum daily emissions for acute risk. Review the maximum daily PTE throughputs and usage rates and ensure they are representative of Cabinetworks' worst-case daily emissions.
3. Talc: DEQ's Toxic Air Contaminant Priority List ([OAR 340-247-8010 Table 1](#)) includes "Talc containing asbestiform fibers" under DEQ ID number 358. While the CASRN for talc is not included in the Priority List, the talc content of these materials should be reported under DEQ ID 358 if it contains asbestiform fibers. DEQ has reviewed Safety Data Sheets (SDSs) for coating materials used at Cabinetworks and found multiple materials which contain talc (CASRN 14807-96-6). DEQ has addressed required updates to the Inventory or supporting calculations in the proceeding "Specific Comments" section.
4. Solid Constituents of Coating Materials: Cabinetworks' emissions calculations apply a transfer efficiency and filter removal efficiency for metal TACs. Transfer and removal efficiencies can be applied to all solid constituents of the coating materials including non-metal TACs such as silica (CASRN 7631-86-9) and talc (CASRN 14807-96-6, DEQ ID 358).

## Specific Comments

1. **Safety Data Sheets:** DEQ reviewed both the safety data sheets (SDSs) and environmental data sheets (EDSs) for materials used at Cablnetworks. Provide the most up-to-date copies of both the SDS and EDS for the following materials. Update the Inventory as needed based on this review.
  - a. CLEAR TITAN BASE ENAMEL (FNEN2078);
  - b. ENAMEL CLEAR TITAN BASE (FNEN2079);
  - c. BLACK PRIMER (FNPR3100); and
  - d. TONER HBRMST/GRYST/BLDR (FNTN4030).
2. **Assembly Glue (TEU-20):** Section 15 of the G-2949 MUI material's SDS lists an ethylene oxide (CASRN 75-21-8) content of less than 0.1 percent by weight. Because ethylene oxide is a TAC of particular concern, DEQ requests additional documentation from the material's manufacturer regarding the content of this TAC in the product. Provide to DEQ the following:
  - a. An updated SDS as the version provided to DEQ is dated 12/12/2022; and
  - b. An EDS which includes the ethylene oxide content; or
  - c. Other manufacturer documentation which includes more refined ethylene oxide content information.
3. **Chromium:** Supporting information provided by Cablnetworks indicates that none of the chromium in coating materials used at the facility is of the hexavalent form. Provide documentation from the manufacturer to support this assumption. DEQ has identified the following materials as containing chromium (CASRN 7440-47-3):
  - a. STAIN AMARETTO NGR (FNST4000);
  - b. STAIN CHESTNUT NGR (FNST4021);
  - c. STAIN EAGLE ROCK NGR (FNST4030);
  - d. STAIN ESPRESSO NGR (FNST4040);
  - e. STAIN FRENCH ROAST NGR (FNST4050);
  - f. STAIN GINGERSNAP NGR (FNST4060);
  - g. STAIN ONYX NGR (FNST4080);
  - h. STAIN RUMBERRY NGR (FNST4100);
  - i. STAIN SMOKE SPRAY (FNST4270);
  - j. TONER HBRMST/GRYST/BLDR (FNTN4030);
  - k. SHRWD UNIV DYE BLACK (FNST3125); and
  - l. SHRWD UNIV DYE RED (FNST3130).
4. **Revised Inventory:** Submit to DEQ a revised Inventory, 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 Inventory:
  - a. TEU Designations:
    - i. Per General Comment 1, Cablnetworks should update the TEU naming in the Inventory to be consistent with the permit.
      1. The coating activities in TEU-1 through TEU-16 represent a single EU in the permit (EU-01). Cablnetworks may include all emissions from the coating lines in a single TEU (EU-01) and define Toxics Emissions Sub-Units (TESUs) if desired.
      2. Rename the Natural gas space heaters TEU (TEU-19) to "EU-02" to be consistent with the naming convention in the permit.

- ii. The raw materials sanding and sawing TEUs (TEU-17 and TEU-18) should be combined into a single TEU.
- b. Per General Comment 2, update PTE maximum daily throughputs or usage rates as appropriate to reflect worst-case short-term conditions.
- c. Per General Comment 3, report all talc (CASRN 14807-96-6) emissions from coating operations under DEQ ID 358. Alternatively, provide documentation from vendors certifying the talc in materials used at Cabinetworks does not contain asbestiform fibers.
- d. Per General Comment 4, if desired, update emission calculations to account for both transfer and filter removal efficiencies for all solid TACs.
- e. Update the Inventory as appropriate with information gathered during the review of SDSs and/or EDSs requested under Specific Comment 1.
- f. Maximum Daily Emissions Basis: Include estimates of maximum daily usage rates and emission estimates for all materials presented in the PTE basis.
- g. TEU-1 through TEU-16: DEQ has reviewed SDSs and EDSs for materials used at the coating lines at Cabinetworks and compared this information against information presented in the “IndependenceToxicsCalcs\_V10.xlsx” workbook. DEQ found multiple discrepancies in weight percent of individual TACs and in some instances missing TACs. Note also that the revisions requested by DEQ are only for those instances where Cabinetworks had a lower composition than information presented in the SDS or EDS.
  - i. WHITE TITAN BASE ENAMEL (FNEN2073):
    - 1. Include emission estimates for 1,3,5-trimethylbenzene (CASRN 108-67-8). The SDS reviewed by DEQ shows a content of less than 1 percent by weight.
    - 2. The Inventory includes emission estimates for propylene glycol monomethyl ether acetate (CASRN 108-65-6), however neither the SDS nor EDS for this material lists propylene glycol monomethyl ether acetate. Unless an updated SDS or EDS is available and shows propylene glycol monomethyl ether acetate as a component of the material, exclude emissions estimates for this TAC from the Inventory.
  - ii. STAIN AMARETTO NGR (FNST4000):
    - 1. Include emission estimates for acetone (CASRN 67-64-1). The EDS reviewed by DEQ shows a content of 77 percent by weight.
    - 2. The Inventory includes emission estimates for isopropyl alcohol (CASRN 67-63-0), however neither the SDS nor EDS for this material lists isopropyl alcohol. Unless an updated SDS or EDS is available and shows isopropyl alcohol as a component of the material, exclude emissions estimates for this TAC from the Inventory.
  - iii. STAIN PECAN WIPE (FNST4090): Include emission estimates for cobalt (CASRN 7440-48-4). The EDS reviewed by DEQ shows a content of 0.1 percent by weight.
  - iv. FLAT REL VAR TOPCOAT (FNSTC0705): Cabinetworks is only required to report the emissions estimates for crystalline silica (CASRN 7631-86-9). Review of this material shows it contains amorphous silica. Unless an updated SDS or EDS is available and shows crystalline silica as a component of the material, exclude emissions estimates for this TAC from the Inventory.
  - v. Include emission estimates for formaldehyde (CASRN 50-0-00) for the following materials. The SDSs for these materials shows a formaldehyde content of less than 0.1 percent by weight.

1. ENAMEL PISTACHIO (FNEN3225);
  2. ENAMEL SPANISH PAPRIKA (FNEN3200); and
  3. ENAMEL CAVERN (FNEN3230).
- vi. Include emission estimates for lead (CASRN 7439-92-1) for the following materials identified by DEQ. The SDSs for these materials list a lead content in Section 15 under the SARA 313 information.
1. STAIN PEPPCORN WIPE (FNST4095);
  2. STAIN HEARTH (FNST4260);
  3. TONER ISLANDER (FNTN4035);
  4. ENAMEL SPANISH PAPRIKA (FNEN3200);
  5. ENAMEL CAVERN (FNEN3230);
  6. ENAMEL HYDRANGEA (FNEN3255);
  7. ENAMEL OCEAN JADE (FNEN3260);
  8. ENAMEL SUCCULENT (FNEN3275);
  9. GLAZE TAUPE CSTAL DRY BRUSH (FNGL4020);
  10. GLAZE GREY TEXTURE BRUSH (FNGL4035);
  11. GLAZE OFF BLACK TEXTURE BRUSH (FNGL4040);
  12. GLAZE WHITE TEXTURE BRUSH (FNGL4045);
  13. PRIMER CHARCOAL FAST DRY (FNPR3125);
  14. STAIN CHESTNUT WIPE ST (FNST4026);
  15. STAIN EAGLE ROCK WIPE (FNST4035);
  16. STAIN GOSSAMER WIPE (FNST4057);
  17. STAIN RUMBERRY WIPE (FNST4105);
  18. STAIN DOCKSIDE 3 (FNST4257);
  19. TONER GOSSAMER (FNTN4060);
  20. TONER DOCKSIDE (FNTN4065);
  21. GLAZE HARVEST/EBONY SPRAY (FNGL4015);
  22. TONER HBRMST/GRYST/BLDR (FNTN4030); and
  23. STAIN HAZELNUT SPRAY (FNST4200).
- vii. Include emission estimates for mercury (CASRN 7439-97-6) for the following materials identified by DEQ. The SDSs for these materials list a mercury content in Section 15 under the SARA 313 information.
1. TONER ISLANDER (FNTN4035);
  2. ENAMEL SPANISH PAPRIKA (FNEN3200);
  3. GLAZE TAUPE CSTAL DRY BRUSH (FNGL4020);
  4. PRIMER CHARCOAL FAST DRY (FNPR3125);
  5. STAIN GOSSAMER WIPE (FNST4057);
  6. STAIN RUMBERRY WIPE (FNST4105);
  7. TONER GOSSAMER (FNTN4060);
  8. TONER DOCKSIDE (FNTN4065); and
  9. TONER HBRMST/GRYST/BLDR (FNTN4030).

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 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](mailto:amy.devita-mcbride@deq.oregon.gov). I look forward to your continued assistance with this process.

Sincerely,

*Amy DeVita-McBride*

Amy DeVita-McBride  
Cleaner Air Oregon Project Engineer

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