



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Agency Headquarters

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October 27, 2025

Freres Lumber Co. Inc.
141 14th St.
Lyons, OR 97358
Sent electronically only

Mike Flewelling,

DEQ called in the Freres Lumber Co. Inc. (Freres) facility in Lyons, OR to the CAO program on October 30, 2024. DEQ received the submittal of the Cleaner Air Oregon (CAO) Emissions Inventory (Inventory) for Freres Lumber Co. Inc. (Freres) in Lyons, OR on February 28, 2025. In accordance with Oregon Administrative Rule [\(OAR\) 340-245-0030\(2\)](#), DEQ issued a written request on July 31, 2025, requiring additional information and a revised Inventory to be submitted by September 29, 2025. Freres submitted a revised Inventory on September 26, 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 Freres with a revised deadline for submittal of a revised Inventory. Please submit the information specified below by December 3, 2025.

1. DEQ met with Freres on October 23, 2025, to discuss the management of the onsite boiler ash storage pile and boiler residuals storage pile. Based on discussions during this meeting, DEQ anticipates that the boiler ash and the boiler residuals storage piles may be considered Exempt Toxics Emissions Units (TEUs) under [OAR 340-245-0060\(3\)](#).

Please provide additional narrative discussion on the management of these TEUs, including the wetting process, maximum size, location, operations, and other pertinent information, to confirm they meet the exempt TEU definition.

2. Provide a revised **CAO Emissions Inventory AQ520 form** that includes the updates and revisions required below:
 - a. In Tab 2 of the AQ520 form, include the percent distribution of the emissions to each emission point. This includes the following TEUs and emission points:
 - i. TUNS1: provide percent distribution of the emissions to each emission point TUNS1A – TUNS1C
 - ii. TUNS2: provide percent distribution of the emissions to each emission point TUNS2A – TUNS2D
 - iii. WELD: provide percent distribution of the emissions to each emission point WELD_P1, WELD_P2, FUG_P4, CAT_SHOP, FAB_SHOP

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.

22-6002 Freres Lumber Co.

DEQ remains available to discuss this information request and answer any questions you may have. Failure to provide additional information, corrections, or updates to DEQ by the deadlines in this letter may result in a violation of [OAR 340-245-0030\(2\)](#).

If you have any questions regarding this letter, please contact me directly at heather.kuoppamaki@deq.oregon.gov or 503-407-7596, and I look forward to your continued assistance with this process.

Sincerely,

A handwritten signature in black ink, appearing to read 'H. Kuoppamaki', with a stylized flourish at the end.

Heather Kuoppamaki, P.E.
Cleaner Air Oregon Project Engineer

Cc: File