

November 13, 2025

Heather Kuoppamaski, P.E.  
Oregon Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232

**Re: CAO Permitting Response to Information Request Dated October 27, 2025**

Dear Heather:

On October 27, 2025, Freres Lumber Co. Inc. (Freres) received a letter from the Oregon Department of Environmental Quality (DEQ) requesting clarifying information about the management of the onsite boiler ash storage pile and boiler residuals storage piles, along with a request for a revised Cleaner Air Oregon (CAO) emissions inventory AQ520 form submittal, for Freres' wood products manufacturing facility in Lyons, Oregon (the facility). Specifically, the DEQ letter requested Freres provide additional narrative discussion on boiler ash material handling activities at the facility, including descriptions of the wetting process, maximum size, location, operations, and other pertinent information, to confirm these activities may be considered Exempt Toxic Emissions Units (TEU). The remainder of this letter presents the requested clarifying information for boiler ash handling activities at the facility. The revised CAO emissions inventory AQ520 form submittal is being submitted concurrently with this response.

Bottom ash from the hogged fuel-fired boiler (TEU ID: BLR3) is dropped through a grate onto a conveyor and is transported to a trammel screen. The trammel screen and associated conveyors are located immediately west of the hogged fuel-fired boiler and are fully enclosed to eliminate the potential for fugitive emissions. The trammel screen is used to separate residual boiler products (a mixture of ash and larger-diameter charred materials) based on size. The trammel screen separates product greater than ¼ inch (6.35mm) from the ash stream. Fly ash collected by the multi-clone and Electrostatic Precipitator are introduced into the enclosed conveyor immediately downstream of the trammel screen.

Larger diameter materials (greater than ¼ inch in diameter) are conveyed to a secondary screening system which separates large, charred organic material from any inorganic material like rocks. Large organic material is returned to the boiler for secondary combustion. All material smaller than ¼ inch is conveyed to a fully enclosed storage silo prior to the secondary screening system which separates organic material larger than 0.04 inch (1mm) from finer material. Both separated materials pass through a continuous water spray system. The water spray system adds moisture to the biochar and fine ash particles and reduces the potential for fugitive emissions during the remainder of the process. The separated biochar is conveyed to a bin where it is manually moved via front-end loader to a storage pile located southwest of the log yard at the south end of the facility. The biochar storage pile is partially enclosed on three-sides and is watered daily during dry periods of the year to keep the moisture content elevated. The larger diameter and elevated moisture content help mitigate the potential for material loss during high-wind events. The wetted biochar is kept onsite until it is picked up by trucks for delivery offsite.

Fine residuals/bottom ash (less than 1mm in diameter) are manually moved by front-end loader to a storage pile, which is partially enclosed on three-sides and is watered daily during dry periods of the year to keep the moisture content elevated. This storage area is immediately north of the biochar

storage area. The boiler ash is delivered to either a landfill or may be delivered to a partner in the concrete industry for testing and/or use in concrete products.

Ash piles maintained in a wetted condition and associated handling systems and activities are considered to be an Exempt TEU per OAR 340-245-0060(3)(b)(00). As detailed above, the biochar and ash storage piles are maintained in a wetted condition, and the associated handling systems and related activities are fully enclosed. Therefore, the boiler ash handling system and onsite storage piles meet the Exempt TEU definition and are considered to be exempt from the risk assessment procedures under the CAO permitting program.

Should the DEQ have any questions or comments about the clarifying information presented in this letter, please don't hesitate to contact Andrew Rogers at (503) 407-6406 or [arogers@maulfoster.com](mailto:arogers@maulfoster.com).