



Oregon

Tina Kotek, Governor

Department of Environmental Quality
Agency Headquarters
700 NE Multnomah Street, Suite 600
Portland, OR 97232
(503) 229-5696
FAX (503) 229-6124
TTY 711

February 5, 2026

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

Mike Flewelling,

Freres Lumber Co. Inc. (Freres) in Lyons, OR, submitted a Cleaner Air Oregon (CAO) Modeling Protocol and Risk Assessment Work Plan to DEQ on January 13, 2026 (Your DEQ Online [YDO] submittal 64865). DEQ has completed an initial review, and in accordance with [Oregon Administrative Rule \(OAR\) 340-245-0030\(2\)](#), has determined that the following additional information, corrections, and updates are required to be submitted by **30** days after the issuance date of this letter, or **March 9, 2026**:

1. Submit an updated Risk Assessment Work Plan including the following revisions:
 - a. Section 4.2.1. Land-Use Zoning Classification Data for Determining Exposure Types. Update the following language: “If there are receptors farther from the proposed facility that are located in roadways or rail rights-of-way that have been unknowingly identified as an exposure location by the automated zoning evaluation process, and these locations have an impact on the risk assessment evaluation, these will be excluded from evaluation in the risk assessment report.” Receptors farther from the facility located in roadways or rail rights-of-way represent the community in general and must not be excluded from evaluation if they fall within a roadway or railway.¹
 - b. Figure 4-4. Proposed Exposure Categorization in the Immediate Area. Add two to four additional residential receptor locations around the residence located along the southwest boundary of the facility to better represent the area of the residential exposure.
2. Submit an updated Modeling Protocol including the following revisions:
 - a. Section 3.2.1 Site Specific Meteorological Data. This section states that the most current two-year calendar period was used. Please use 5-years of representative NWS surface data and concurrent representative upper air data or provide justification for only using 2-years of data.²
 - b. Table 2-1. Proposed Annual TAC Emission Rates (Significant TEUs)
 - i. For the following TEUs with emission estimates calculated from mass balance equations, daily emission rates are reported in Table 2-1. Please update Table 2-1 to report annual emission rates for these TEUs.
 1. FAB_MB
 2. CAT_MB
 3. WELD_P
 4. MB_P4

¹See Cleaner Air Oregon frequently asked questions for facilities, Step 4: Risk Assessment Work Plan. Specifically, the question regarding “How should I handle risk on roadways and railways?”.

<https://www.oregon.gov/deq/aq/cao/Pages/faq-step4.aspx>

²See Table 2 “Meteorological Data Considerations for Air Dispersion Modeling:

<https://www.oregon.gov/deq/aq/cao/Documents/CAORP-AirQualityModeling.pdf>

5. MB_P2
 6. MB_P1
- ii. CASRN 108-67-8 is mis-labeled as “1,2,5-Trimethylbenzene”. Update this TAC to be “1,3,5-Trimethylbenzene”.
 - iii. WELD_P1. The approved Emissions Inventory includes emissions from both emission factor calculations and mass balance calculations for this TEU. The emission rates provided in Table 2-1 are only from the emission factor calculations. Update the emission rates provided to include both the emission factor calculated emissions and the mass-balance calculated emissions.
- c. Tables 2-4 Proposed Annual TAC Emission Rates (Gas Exempt TEUs) and 2-5 Proposed Daily TAC Emission Rates (Gas-Exempt TEUs): Add the Propane EGEN TEU or provide justification for why this TEU is not included in the table.
 - d. Table 2-6. (Proposed Model Release Parameters). Move the BLR3_NG from “Singificant TEUs” to “Gas Exempt TEUs” or provide justification for maintaining the table location.
 - e. Revise either the AQ520 form or Tables 2-1, 2-2 and 2-3 of the Modeling Protocol to ensure that the model point IDs for both documents match. Specific instances of the Modeling Protocol model point IDs not matching the AQ520 form are:
 - i. The Modeling Protocol has model points MB_P1 and MB_P2 while the AQ520 form has corresponding model points Fug_P1 and Fug_P2;
 - ii. The Modeling Protocol combines model points WELD_P4 and FUG_P4 emissions while the AQ520 form has these as separate model points;
 - iii. The Modeling Protocol has separate model points BLR3 and BLR3_SU while the AQ520 has these as one combined model point.

DEQ requests that you submit additional information to complete your CAO Modeling Protocol and Risk Assessment Work Plan. 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 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\(2\)](#).

Sincerely,



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

Cc: File