



Oregon

Tina Kotek, Governor

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December 8, 2025

Murphy Company dba Murphy Veneer
5205 North River Road
Rogue River, OR 97537
Sent electronically only

Brent Way,

DEQ called in Murphy Company dba Murphy Veneer (Murphy) in Rogue River, OR to the Cleaner Air Oregon (CAO) program on June 30, 2025. DEQ received the CAO Emissions Inventory AQ520 form (Inventory) from Murphy on September 29, 2025. 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 **60** days after the issuance date of this letter, or **February 6, 2026**:

1. Categorically exempt Toxic Emissions Units (TEUs):
 - a. In accordance with [OAR 340-245-0030\(1\)&\(3\)](#), Murphy must submit a Categorically Exempt Toxics Emissions Units form ([Form AQ523](#)) listing TEUs that are exempt under [OAR 340-245-0060\(3\)\(b\)](#);
2. Provide a Process Flow Diagram including the following items in accordance with [OAR 340-245-0040\(4\)\(b\)\(C\)\(i\)](#):
 - a. All TEU IDs as provided on the AQ520 form; and
 - b. All emission point IDs as provided on the AQ520 form.
3. Submit a revised Inventory that addresses the following comments:
 - a. DEQ received the AQ520 form, but an outdated version of the form was used. As previously instructed during the Kick-Off Meeting, held on July 17, 2025, please resubmit the inventory using the current [AQ520 form version 2.0](#).
 - b. Please provide all supporting calculation work in a separate Excel workbook. Do not add worksheets to the AQ520 form itself as this allows DEQ to maintain the integrity of the required form.
 - c. Veneer Dryers
 - i. Add the following Toxic Air Contaminants (TACs) and emission factors from National Council for Air and Stream Improvement (NCASI) Technical Bulletin No. 768 (1999) or provide alternative emission factors with supporting documentation. Use of the NCASI emission factors is recommended where site-specific data is not available:
 1. Methyl isobutyl ketone (CASRN 108-10-1); and
 2. Styrene (CASRN 100-42-5).
 - ii. Update the following emission factors for the Veneer Dryer using recent source test data (conducted within the past 10 years) or apply emission factors from NCASI Technical Bulletin No. 768 (1999) where appropriate:
 1. Toluene (CASRN 108-88-3);

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2. Propionaldehyde (CASRN 123-38-6);
 3. Phenol (CASRN 108-95-2);
 4. Methanol (CASRN 67-56-1);
 5. Formaldehyde (CASRN 50-00-0);
 6. Acrolein (CASRN 107-02-8);
 7. Acetaldehyde (CASRN 75-07-0);
 8. Benzene (CASRN 71-43-2); and
 9. Xylene (CASRN 1330-20-7).
- iii. Clearly label Methanol (CASRN 67-56-1) and Formaldehyde (CASRN 50-00-0) emission factors derived from source testing.
 - iv. Please identify whether the veneer dryers process softwood, hardwood, or a species mix (e.g., Douglas-fir, pine).
 - v. Indicate whether each dryer is gas-fired, wood-fired, or steam-heated.
 - vi. Provide the number of dryers, fuel type(s), throughput, and annual operating hours used in emissions calculations.
- d. Presses
- i. Update the following emission factors using recent source test data (conducted within the past 10 years) or apply emission factors from NCASI Technical Bulletin No. 768 (1999) where appropriate:
 1. Methanol (CASRN 67-56-1);
 2. Formaldehyde (CASRN 50-00-0);
 3. Phenol (CASRN 108-95-2);
 4. Acetaldehyde (CASRN 75-07-0); and
 5. 2-Butanone (CASRN 78-93-3).
 - ii. Clearly label Methanol (CASRN 67-56-1) and Formaldehyde (CASRN 50-00-0) emission factors derived from source testing.
- e. Wood-fired Boiler
- i. For the purposes of boiler activity reporting, provide either of the following and include justification, including example calculations, parameters used, and supporting information (such as Continuous Emission Monitoring System (CEMS) or source test data):
 1. A proposed ratio or method for converting steam output (in thousand pounds of steam) to heat input (in million British thermal units (MMBtu); or
 2. A proposed method for tracking heat input in MMBtu (such as CEMS reports).
 - ii. Revise the activity units for the following emission factors for consistency to be in lb/MMBtu:
 1. Hydrochloric acid (CASRN 7647-01-0) provided in lb/Mlb steam;
 2. Polychlorinated biphenyls (PCBs) (CASRN 1336-36-3) provided in lb/Mlb steam; and
 3. PCB-209 [decachlorobiphenyl] (CASRN 2051-24-3) provided in lb/Mlb steam.
 - iii. Include startup and shutdown emissions scenarios, including:
 1. Consideration of TACs emitted from the boiler when operating without Electrostatic Precipitator (ESP) control during startup and shutdown, under worst-case potential to emit annual and daily scenarios; and

2. Additional AQ520 forms as needed to represent additional modeled scenarios – separate AQ520 forms for each scenario can facilitate ease of review.
 - iv. Include emissions of chlorine (CASRN 7782-50-5) using an emission factor of 7.9×10^{-4} lb/MMBtu¹
 - v. Include emissions of di-n-octylphthalate (DEQ ID 518) using an emission factor of 1.1×10^{-7} lb/MMBtu²
- f. Regenerative Catalytic Oxidizer (RCO)
 - i. Indicate in the Inventory if the 90% RCO Destruction Efficiency from your Standard Air Contaminant Discharge Permit (15-0014-ST-01) was applied to emissions from this TEU.
- g. Welding Operations
 - i. Provide the San Diego Air Pollution Control District (SDAPCD) Welding Operations methodology, emission factors, and calculation worksheets used to demonstrate emissions are exempt.
 - ii. Welding E7018 usage exceeds the threshold of 50 lb/year provided in the [“Cleaner Air Oregon Exempt TEU Reporting” document](#) and therefore emissions from this activity are required to be included as a significant TEU.
 - iii. If molybdenum is present in any welding rods or electrodes, assume 100 percent of molybdenum is converted to molybdenum trioxide (CASRN 1313-27-5) when reporting emissions.
- h. Toxicity Equivalency (TEQ) and Emissions Calculations
 - i. Provide justification for the assumption used that 1 oven-dry ton of wood = 16 MMBtu (8,000 Btu/lb), or revise for wood species and moisture content.
 - ii. Clarify whether mean values or 95th percentile values were used when selecting emission factors from NCASI.
 - iii. Provide VOC/HAP manufacturer test reports used in calculations.
- i. Plywood Layup
 - i. Provide justification for the assumption of 99.9% control efficiency applied to the emissions calculations, as this is different than transfer efficiency.
4. Provide the following information along with the submittal of the updated Inventory:
 - a. Materials Information
 - i. Safety Data Sheets (SDS) for all chemicals that may be used at the facility including all patch catalysts, stencil paint, glues, resins, sealants, coatings, cleanup solvents, and maintenance coatings used onsite.
 - ii. Confirm that the SDS list provided includes all TAC-containing materials used in production, maintenance, cleanup, and support operations.
 - b. Veneer Dryers
 - i. Clarify whether all dryers vent to the RCO or if any dryers exhaust directly to atmosphere. If multiple veneer dryers are manifolded to a single control device, please include a flow schematic illustrating how emissions are distributed.

¹AP-42 Section 1.6, Table 1.6-3 “Emission Factors for Speciated Organic Compounds, Total Organic Carbon (TOC), Volatile Organic Carbon (VOC), Nitrous Oxide, and Carbon Dioxide from Wood Residue Combustion”, revised 9/03.

² NCASI Technical Bulletin 1050: Compilation of Air Toxics Emissions Data for Pulp and Paper Sources – Publication Accompanying the 2018 Air Toxics Emissions Database, Table 7.1 “Summary of Non-Metal Air Toxic Emissions from Wood Fired Boilers”

- c. Wood-fired Boiler
 - i. Provide the description of current startup and shutdown procedures for the boiler, including time required to achieve the target temperature for energizing the ESP
 - ii. Provide the moisture content, ash content, and species composition of the hog fuel burned in the boiler.
 - iii. Indicate whether any non-wood materials (e.g., sander dust containing resin, adhesives, or press additives) are included in the fuel stream.
- d. Regenerative Catalytic Oxidizer (RCO)
 - i. Provide the RCO operating temperature, residence time, catalyst type, and any manufacturer specifications supporting these assumptions.
- e. Welding Operations
 - i. Provide the number of welders and the annual hours of welding considered in the emissions calculations.
 - ii. Indicate whether welding occurs indoors or outdoors, and whether any local exhaust ventilation or filtration is used.
 - iii. Provide SDS for all welding rods or electrodes used.

DEQ requests that you provide additional information to complete your Inventory submittal in YDO (#69894). 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\(2\)](#).

If you have any questions regarding this letter please contact me directly at (971) 263-9350 or dana.corkill@deq.oregon.gov. I look forward to your continued assistance with this process.

Sincerely,

Dana Corkill

Dana Corkill
Cleaner Air Oregon Project Engineer

Cc: Steven LaFranchi, Environmental Science Associates, Inc.
Wayne Kauzlarich, DEQ
J R Giska, DEQ
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