Oregon
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March 3, 2026

Swanson Group Mfg. LLC
2635 Old Hwy 99 South
Roseburg, OR 97470
Sent electronically only

Jeff Remington,

Swanson Group Mfg. LLC, (Swanson MFG) in Roseburg, OR submitted a Cleaner Air Oregon (CAO) Emissions Inventory (Inventory) to DEQ on August 28, 2025. (Your DEQ Online [YDO] submittal 68543) 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 **May 4, 2026.**

General Comments

1. Toxics Emissions Unit (TEU) Lumber Drying Kiln (LDK) has four Sub-Units (TESUs) based on type of wood dried in the kiln (LDK_DF, LDK_WF, LDK_WH, LDK_LP). Please note that the activity levels presented in Tab 2 of the AQ520 form for these TESUs could become permit limits on a wood type basis. DEQ is available to discuss alternative throughput estimation methods if there are concerns with this potential permit limit.
2. The daily activity limits for TEU LDK should represent the maximum amount of lumber loaded into the kilns for drying in any 24-hour period. For lumber dried in batches with drying times longer than 24 hours, DEQ does not generally approve the assumption that daily kiln emissions are distributed evenly over a period greater than 24 hours without justification. DEQ is available to discuss the maximum daily activity levels if there are concerns.
3. For the boiler, TEU KB, two complete scenarios should be provided. DEQ recommends submitting these in two separate AQ520 forms.
    a. The first scenario is normal operations without startup; this scenario should include all the throughput required for normal activities.
    b. The second scenario should be a worst-case day with startup activities followed by normal operations. The throughput for the second scenario should include the maximum throughput for startup operations in addition to the maximum operational hours that could be conducted in a startup day.
    c. These activity levels may become permit limits. DEQ is available to discuss if there are concerns with the potential permit limits.

Specific Comments

1. Submit to DEQ the following **additional information**:
    a. A list of the onsite "Distillate oil, kerosene, gasoline, natural gas or propane burning equipment" that are being considered as categorically exempt TEU activities. Provide throughput, fuel storage, and Btu/hour ratings to confirm the equipment meets the requirements to be exempted using OAR 340-245-0060(3)(b)(B).

b. Manufacturer data for the natural gas-fired emergency generator (NG_EGEN) to justify using emission factors for a 4 stroke, rich burn engine.

2. Submit to DEQ **revised supporting calculations** in Excel format including the following updates:
   a. For TEU GDF, use the attached gasoline compositional data to speciate the VOC emissions.
   b. For TESUs SHOP_ANY and SHOP_E309:
      i. For welding type ER70S-6 – the emissions estimates refer to the annual activity rate for E70T, not ER70S-6. Please update to resolve this discrepancy.
      ii. Use the methodology outlined in San Diego County Air Pollution Control District (SDAPCD) Welding Operations Guidance.[1] For welding rod and welding processes that are listed in AP-42 12.19, use the calculation methodology provided in Sections 1.1.1 and 1.1.2 of the SDAPCD guidance. DEQ has also provided our Welding Emissions Tool. This includes the following:
         1. For welding type E70T:
            a. Use the PM_{10} Emission Factor of 15.1 lb/lb from AP 42 Table 12.19-1 and the methodology in SDAPCD section 1.1.2 when calculating annual emissions for toxic air contaminants (TACs) listed in the SDS but not listed in AP-42 Table 12.19-2. This includes the following TACs:
               i. Aluminum and compounds (CASRN 7429-90-5);
               ii. Include quartz as respirable crystalline silica (CASRN 7631-86-9) at a concentration of 0.55%; and
               iii. Include calcium fluoride as fluorides (DEQ SEQ ID 239) at a concentration of 0.55%.
            b. Include the following TACs from AP-42 12.19 and use the methodology in SDAPCD Section 1.1.1 to estimate annual emissions:
               i. Hexavalent Chromium (CASRN 18540-29-2). Use the Total Chromium emission actor of 0.004 lb/Mlb in AP-42 Table 12.19-2 and multiply by the 10% conversion rate for FCAW; and
               ii. Insoluble nickel compounds (DEQ SEQ ID 365). Use the 0.005 lb/Mlb emission factor in AP-42 Table 12.19-2.
         2. For welding type ER5356: Emissions estimates for aluminum and compounds (CASRN 7429-90-5) use the annual usage from E70T (1,200 lb/yr). The annual usage reported for ER5356 is 10 lb/yr. Please update to resolve this discrepancy.
         3. For welding type FABTUF 960:
            a. Report nickel as insoluble nickel compounds (DEQ SEQ ID 365).
         4. For welding type ER4043:
            a. Emissions estimates for aluminum and compounds (CASRN 7429-90-5) use the annual usage for E70T (1,200 lb/yr). The annual usage reported for ER4043 is 10 lb/yr. Please update to resolve this discrepancy.
            b. Emissions estimates for copper and compounds (CASRN 7440-50-8) use the annual usage for FABTUF960 (200 lb/yr). The annual usage reported for ER4043 is 10 lb/yr. Please update to resolve this discrepancy.
         5. For welding type ER60-6:
            a. The information provided is a product description, not an SDS. Please provide an SDS for this material.

[1] https://www.sdapcd.org/content/dam/sdapcd/documents/permits/emissions-calculation/welding/APCD-Welding-Operations.pdf

b. Emissions estimates use the annual wire usage for FABTUF960 (200 lb/yr). The annual usage reported for ER60-6 is 50 lb/yr. Please update to resolve this discrepancy.
c. Include phosphorous as phosphorous and compounds (DEQ SEQ ID 504) at a concentration of 0.0125%.
d. Report nickel as insoluble nickel compounds (DEQ SEQ ID 365).

6. For welding type FABCO EXCEL ARC-71
   a. Include copper as copper and compounds (CASRN 7440-50-8) at a concentration of 0.5%.
   b. Include as respirable crystalline silica (CASRN 7631-86-9) at a concentration of 1%.
   c. Emissions estimates for aluminum and compounds (CASRN 7429-90-5) use the annual usage for E70T (1,200 lb/yr). The annual usage reported for FABCO EXCEL ARC-71 is 90 lb/yr. Please update to resolve this discrepancy.
   d. Emissions estimates for the following TACs use the annual usage for FABTUF960 (200 lb/yr). The annual usage reported for FABCO EXCEL ARC-71 is 90 lb/yr. Please update to resolve this discrepancy.
      i. Manganese and compounds (CASRN 7439-96-5); and
      ii. Molybdenum trioxide (CASRN 1313-27-5).
7. For welding type E7018
   a. Use the PM_{10} Emission Factor of 15.1 lb/lb from AP-42 Table 12.19-1 and the methodology in SDAPCD section 1.1.2 when calculating annual emissions for TACs listed in the SDS but not listed in AP-42 Table 12.19-2. This includes the following TACs:
   b. Include the following TACs from AP-42 12.19 and use the methodology in SDAPCD Section 1.1.1 to estimate annual emissions:
      i. Hexavalent Chromium (CASRN 18540-29-2). Use the Total Chromium emission actor of 0.006 lb/Mlb in AP-42 Table 12.19-2 and multiply by the 55% conversion rate for SMAW; and
      ii. Include cobalt and compounds (CASRN 7440-50-8) using an emission factor of 0.0005 lb/lb.
   c. Emissions estimates use the annual wire usage for E309 (20 lb/yr). The annual usage reported for E7018 is 2,000 lb/yr. Please update to resolve this discrepancy.
8. For welding type E308:
   a. The concentration of aluminum and compounds should be reported as 3%.
   b. Report nickel as insoluble nickel compounds (DEQ SEQ ID 365).
9. For welding type E309: Report nickel as insoluble nickel compounds (DEQ SEQ ID 365).

2. Submit to DEQ a **revised AQ520 Inventory Form**, along with all supporting calculations in Excel format, as well as all information required under OAR 340-245-0040(4).
   a. For SHOP TESUs (SHOP_ANY and SHOP_E309)
      i. Currently, SHOP_ANY and SHOP_E309 are listed on Tab 2, but only emissions for SHOP_E309 are listed on Tab 3. Please modify the welding TESUs so TESUs listed on Tab 2 also have emissions estimates in Tab 3. This could be done by combining them into one TEU in Tab 2 and including a note in Column L that the daily emission factors are based on the worst-case rod usage; or reporting annual and daily separate in Tab 3.

ii. Confirm Maximum Daily usage is one (1) lb per day, or provide material supporting this daily usage rate. This is not consistent with an average annual usage of 4,100 lb per year.
iii. Update as necessary to incorporate changes to emissions estimates based on comments in Specific Comment 2.b, above.

b. Include wood chip storage as an Exempt TEU in Tab 2. Methanol is a known TAC emission from wood chip piles.[2] However, based on worse case throughput, the potential risk is below ½ of the Aggregate TEU Level and the wood chip storage can be considered an Exempt TEU in accordance with OAR 340-245-0060(3)(a).
c. Tab 5, Column F "Percent Composition" should be entered as a decimal, not whole number. The emissions estimates are calculated correctly.
d. For the TESUs KB_N and KB_SU, report nickel as insoluble nickel compounds (DEQ SEQ ID 365).
e. Update the AQ520 form as necessary to incorporate changes to emissions estimates based on comments in Specific Comment 2.a, above.

DEQ requests that you submit additional information to complete your Emissions 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 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,

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

Cc: Jonathan Wright, DEQ
File

Attachments:

DEQ gasoline compositional data
DEQ Welding Emissions Tool

[2] See PotlatchDeltic Land & Lumber PSD permit from EPA Region 10, https://www.epa.gov/sites/default/files/2019-06/documents/190621_potlatchdeltic_psd_fact_sheet.pdf