



Oregon

Tina Kotek, Governor

Department of Environmental Quality
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March 19, 2026

Mutual Materials Company
2300 SE Hogan Rd
Gresham, Oregon 97080
Sent electronically only

James Smith,

DEQ called in the Mutual Materials Company (Mutual Materials) in Gresham, OR to the Cleaner Air Oregon (CAO) program on April 26, 2024. DEQ received the submittal of a CAO Emissions Inventory (Inventory) for Mutual Materials on July 25, 2024, followed by the submittal of an updated Inventory on December 20, 2024. Mutual Materials contacted DEQ on June 3, 2025, indicating their decision to cease brick manufacturing activities, including kiln drying operations, and focus solely on concrete paver production. Based on these operational changes, DEQ requested that an updated Inventory be submitted on November 25, 2025.

Mutual Materials submitted a revised Inventory to DEQ on November 25, 2025 (Your DEQ Online Submittal #73671). DEQ has completed an initial review, and in accordance with [OAR 340-245-0030\(4\)\(b\)](#), 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 **April 20, 2026**:

1. **Revised Inventory:** Submit to DEQ a revised AQ520 form, along with all supporting calculations in Excel format, as well as all information required under [OAR 340-245-0040\(4\)](#). Include the following updates to the AQ520 form:
 - a. **TEUs SILO_1 through SILO_10:** Update the “CASRN or DEQ ID” in Column C of Worksheet 3 for all instances of “Nickel and compounds” (CASRN 7440-02-0) to DEQ ID 365. The listed CASRN is for nickel metal, which alone does not have a Risk-Based Concentration (RBC), but is included in the list for “Nickel compounds, insoluble” chemical grouping with the DEQ ID 365, which has an established RBC.
 - b. **TEU MIX:**
 - i. Update the “CASRN or DEQ ID” from “Nickel and compounds” (CASRN 7440-02-0) to DEQ ID 365, as detailed in Comment 1.a. above.
 - ii. DEQ will not approve a 50% capture efficiency assumption for the building envelope to estimate emissions from TEU MIX without supporting justification. Remove the 50% capture efficiency corrections from Worksheet 3 of the AQ520 form for TEU MIX or provide sufficient justification for the building envelope capture efficiency assumption of 50%.

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

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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 503-913-6658 or Katie.Eagleson@deq.oregon.gov, and I look forward to your continued assistance with this process.

Sincerely,

Kathleen H Eagleson

Katie Eagleson, PE
Air Toxics Permitting Engineer

Cc: Leslie Riley, Maul Foster & Alongi, Inc.
Stephen Wozab, DEQ
J.R. Giska, DEQ
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