



Oregon

Tina Kotek, Governor

Department of Environmental Quality
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TTY 711

July 22, 2026

Cabinetworks Group
625 Hoffman Rd.
Independence, OR
Sent electronically only

John Hamlin,

DEQ called in the Cabinetworks Group (Cabinetworks) in Independence, OR to the Cleaner Air Oregon (CAO) program on August 29, 2024. DEQ received the submittal of the CAO Emissions Inventory (Inventory) for Cabinetworks on November 26, 2024 (Your DEQ Online Submittal ID 63519). In accordance with [Oregon Administrative Rule \(OAR\) 340-245-0030\(2\)](#), DEQ issued a written request on February 20, 2025, requiring additional information and a revised Inventory to be submitted by April 22, 2025. Cabinetworks submitted a revised Inventory on April 28, 2025. In accordance with [OAR 340-245-0030\(4\)\(b\)](#), DEQ issued a written request on September 3, 2025, requiring additional information and a revised Inventory which Cabinetworks submitted on November 17, 2025. DEQ issued a written request on March 10, 2026, requiring additional information and a revised Inventory which Cabinetworks submitted on May 8, 2026. Cabinetworks submitted a revision to the Coating operations inventory on June 15, 2026.

DEQ has reviewed the Inventory and identified additional updates that are needed before approval. In accordance with [OAR 340-245-0030\(4\)\(b\)](#), DEQ is providing Cabinetworks with a revised deadline for submittal of a revised Inventory. Please submit the information specified below by no later than **30 days** after the issuance date of this letter, or **August 21, 2026**.

1. **Chromium:** Provide documentation to confirm that the STAIN SMOKE SPRAY (FNST4270) material does not contain chromium in the hexavalent form. In the May 8, 2026, submittal, Cabinetworks provided supporting information from Sherwin Williams confirming that the chromium noted in the safety data sheets (SDSs) and/or environmental data sheets (EDSs) for multiple coating materials is not of the hexavalent form (chromium VI, CASRN 18540-29-9), but this material was not included.
2. **Revised Inventory:** 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\(4\)](#). Include the following updates to the Inventory:
 - a. Natural Gas Space Heaters (EU-02): DEQ has reviewed the coating operation emissions presented in the "IndependenceToxicsCalcs_V11NaturalGas.xlsx" workbook and has the following requested updates:

- i. Include emissions estimates for benzo[a]pyrene (CASRN 50-32-8). The emission factor for benzo[a]pyrene is 0.0000012 lb/MMSCF (AP-42 Chapter 1.4, Table 1.4-3).¹
- b. **Coating Operations (EU-01):** DEQ has reviewed the coating operation emissions presented in the "IndependenceToxicsCalcs_V11.xlsx" workbook and has the following requested updates:
 - i. Review the formula for calculation of the annual material usage rate in Column P of the "Data - Products" worksheet. In some cells the SUMIFS function appears to contain errors related to the Column H reference. Revise as appropriate.
 - ii. Cabinetworks may remove emission estimates for chromium VI, chromate and dichromate particulate (CASRN 18540-29-9) for those materials which do not contain chromium in the hexavalent form. The following materials have a chromium VI content of 0 percent included in the Inventory:
 - 1. STAIN AMARETTO NGR (FNST4000);
 - 2. STAIN EAGLE ROCK NGR (FNST4030);
 - 3. STAIN ESPRESSO NGR (FNST4040);
 - 4. STAIN FRENCH ROAST NGR (FNST4050);
 - 5. STAIN GINGERSNAP NGR (FNST4060);
 - 6. STAIN ONYX NGR (FNST4080);
 - 7. STAIN RUMBERRY NGR (FNST4100);
 - 8. STAIN SMOKE SPRAY (FNST4270);
 - 9. TONER HBRMST/GRYST/BLDR (FNTN4030);
 - 10. SHRWD UNIV DYE BLACK (FNST3125); and
 - 11. SHRWD UNIV DYE RED (FNST3130).
 - iii. Revise the acetone (CASRN 67-64-1) content for the following materials based on the information presented in the most recent EDS for the material. Updated EDSs for these materials were submitted to DEQ in the May 8, 2026 submittal.
 - 1. STAIN AMARETTO NGR (FNST4000);
 - 2. STAIN EAGLE ROCK NGR (FNST4030); and
 - 3. STAIN ESPRESSO NGR (FNST4040).
 - iv. Revise the propylene glycol monomethyl ether (CASRN 107-98-2) content for the following materials based on the information presented in the most recent EDS for the material. Updated EDSs for these materials were submitted to DEQ in the May 8, 2026, submittal.
 - 1. STAIN GINGERSNAP NGR (FNST4060);
 - 2. STAIN ONYX NGR (FNST4080); and
 - 3. SHRWD UNIV DYE RED (FNST3130).
 - v. BLACK PRIMER (FNPR3100): The Inventory contains two rows which account for the aluminum (CASRN 7429-90-5) content of this material. Delete one of the instances.
 - vi. TONER HBRMST/GRYST/BLDR (FNTN4030): The following TACs are included in the Inventory for this material but are not listed in either the material's SDS or EDS. Review and revise as appropriate.

¹ EPA. September 1998. AP-42 Chapter 1, Table 1.4-3 "Emission Factors for Speciated Organic Compounds from Natural Gas Combustion." https://www.epa.gov/sites/production/files/2020-09/documents/1.4_natural_gas_combustion.pdf

1. Propylene glycol monomethyl ether (CASRN 107-98-2); and
 2. Cobalt (CASRN 7440-48-4).
- vii. STAIN GINGERSNAP NGR (FNST4060): Revise the density based on the information presented in material's the most recent SDS and/or EDS.

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 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 with you and answer any questions you may have. Failure to provide additional information, corrections, or updates to DEQ by the deadlines above may result in a violation of [OAR 340-245-0030\(4\)\(b\)](#).

If you have any questions regarding this letter please contact me directly at (971) 300-3653 or amy.devita-mcbride@deq.oregon.gov. I look forward to your continued assistance with this process.

Sincerely,



Amy DeVita-McBride
Cleaner Air Oregon Project Engineer

Cc: John Batrouny, Cabinetworks Group
Betty Ann Prior, Cabinetworks Group
Gregory Raetz, HDR Inc.
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