

July 10, 2026

Amy Devita-McBride
Cleaner Air Oregon Project Engineer
Oregon DEQ
700 NE Multnomah St., Suite 600
Portland, Oregon 97232

Sent Electronically via YDO

Dear Amy Devita-McBride

This letter summarizes our responses to your July 10, 2026 letter providing comments on the revised Modeling Protocol and Risk Assessment work plan (MP & RAWP) submitted for Cleaner Air Oregon (CAO) on May 27, 2026. Biomass One is submitting a revised Modeling Protocol and Risk Assessment Work Plan in response to these comments and other changes by the requested deadline of July 18, 2026.

Biomass One has responded to each request for additional information below. In addition, Biomass One has made the following additional changes to the May 27th submittal that impact information provided in Appendix D:

- Buildings B_5, B_6, B_8, B_7A, and B_7B and exhaust stacks for the Biomass boilers (EU11 and EU12) have slightly modified locations with the use of more accurate mapping software.
- The building heights of B_5 and B_6 have been adjusted to a more accurate measurement of the building roofs compared to the emission units EU11 and EU12.

The comments provided in your July 10th letter are provided below followed by Biomass One's response in **bold**.

1. The following TACs are listed in Section 3.2.1, but do have Risk-Based Concentrations (RBCs) in [OAR 340-245-8010 Table 2](#):
 - a. 1,4-Dioxane (CASRN 123-91-1);
 - b. 2,4,6-Trichlorophenol (CASRN 88-06-2);
 - c. Dichloromethane (CASRN 75-09-2);
 - d. Diethanolamine (CASRN 111-42-2);
 - e. Diethylene glycol monobutyl ether (CASRN 112-34-5);
 - f. Ethylene oxide (CASRN 75-21-8);
 - g. Trichloroethene (CASRN 79-01-6);
 - h. Vinyl chloride (CASRN 75-01-4);
 - i. Nickel and compounds (CASRN 7440-02-0). See Comment 6.a below;
 - j. Propylene glycol monomethyl ether (CASRN 107-98-2); and
 - k. Fluorides (CASRN 239).

Biomass One Response: These TACs have been removed from section 3.2.1 and have been included in our calculation of REERs as highlighted in Appendix E of the revised MP & RAWP.

2. In Section 3.1.2, Biomass One notes the following exposure location assignments on Mixed Farm-Forest (MFF) and Exclusive Farm-Use (EFU) zoned lands: residential for houses, worker for barnyards, and acute-only for fields or forests. Additionally, Biomass One indicated that receptors located in MFF or EFU zoned lands within 1.5 kilometers (km) of the facility will be categorized as acute-only exposure locations except for any residences or working areas identified via satellite imagery. Per [OAR 340-245-0020\(43\)](#) and CAO guidance, any location where a house currently exists or could exist under zoning laws must be treated as a residential exposure location. To evaluate receptors on MFF and EFU zoned land as acute-only within 1.5 km of the facility, Biomass One must submit to DEQ both an AQ521 and an AQ522 form listing all receptors for which you are seeking an exposure location reclassification. [[OAR 340-245-0210\(1\)\(a\)\(F\)](#)] If DEQ approves the reclassification of these receptors, Biomass One will be required to submit annual verifying that land use at these receptors has not changed. [[OAR 340-245-0210\(1\)\(a\)\(F\)\(ii\)](#)] Alternatively, Biomass One can treat all receptors on EFU and MFF zoned land as residential

exposure locations.

Biomass One Response: Biomass One has chosen to represent all receptors zoned as EFU and MFF as residential exposure locations. With this change, no receptors evaluated are classified as less conservative than their expected zoning, so an AQ521 and AQ522 form is not required. Appendix G has been adjusted to represent the modified receptor designations, as well as Figure 3-1 in the MP & RAWP. A number of receptors were excluded from the chronic and acute receptor designations as they were found through satellite imagery to fall on roads or railroads, which means risk will not be evaluated at those locations.

3. Update the lists of TACs with multipathway adjustment factors in Section 3.2.3 to include dioxins, which are noted as being emitted from the source.

Biomass One Response: This section has been adjusted to discuss how multipathway (MPF) adjustments are considered in using RBCs without listing specific pollutants. Dioxins and Furans will not pose additional pathway impacts because all parcels with homes present, where people would experience a prolonged period of deposition will be treated as residential exposure. Residential RBCs include MPFs.

4. Revise the statement about reference concentrations (RfCs) and unit risk factors (URFs) in Section 3.2.5 to indicate that Cancer URFs are developed to be protective, but unlike RfCs, they do not include uncertainty factors.

Biomass One Response: This section has been modified to not describe Cancer URFs as including uncertainty factors.

5. DEQ has reviewed the modeling emission rate calculations (Appendix C) in the "Appendix C. and E. Biomass One - CAO MP and RA WP.xlsx" workbook and identified the following errors which need to be addressed in the "Long Term Emission Rates per Emission Unit" table on the "ER – LT" Worksheet:
 - a. Incorrect emissions estimates for Methylene diphenyl diisocyanate (CASRN 101-68-8) from the Great Stuff Big Gap Filler material use at TEU-062.

Biomass One Response: This tab has been adjusted to include the emissions for the Great Stuff Big Gap Filler for CASRN 101-68-8.

6. DEQ has reviewed the Risk-Equivalent Emission Rate (REER) calculations (Appendix E) in the "Appendix C. and E. Biomass One - CAO MP and RA WP.xlsx" workbook and identified the following errors which need to be addressed:
 - a. Risk from emissions of Nickel and compounds (CASRN 7440-02-0) should be assessed using the RBCs for Nickel compounds, insoluble (DEQ ID 365). Update the REER calculations for the following TEUs/TESUs:
 - i. North Boiler, Biomass Fuel, Heat Input (TESU EU-011);
 - ii. North Boiler, NG Startup (TESU EU-011_Startup);
 - iii. South Boiler, Biomass Fuel, Heat Input (TESU EU-012);
 - iv. South Boiler, NG Startup (TESU EU-012_Startup); and
 - v. Space Heater (TEU EU-013).

Biomass One Response: The risk from the emissions from the above sources have been adjusted to use the relevant RBCs for Insoluble zNickel (DEQ ID 365) to calculate the REERs for those TEU/TESU's. This change can be seen In Appendix E.

- b. The table of RBCs referenced in the REER calculations ("ODEQ RBCs" worksheet) is missing the following TACs, resulting in incomplete REER calculations for the Truck Shop Material Usage TEU (TEU-062):
 - i. 1,4-Dioxane (CASRN 123-91-1);
 - ii. Diethanolamine (CASRN 111-42-2);
 - iii. Diethylene glycol monobutyl ether (CASRN 112-34-5); and

- iv. Ethylene oxide (CASRN 75-21-8).

Biomass One Response: These TACS have been added to the RBC tables in the REER Calculations (Appendix E).

- c. The Acute Noncancer REER calculations ("ACUTE" worksheet) have errors in the reference to emission rates in the "ER - ST" worksheet for the following TACs:
 - i. Diethanolamine (CASRN 111-42-2);
 - ii. Ethylene oxide (CASRN 75-21-8);
 - iii. 1,4-Dioxane (CASRN 123-91-1);
 - iv. Diethylene glycol monobutyl ether (CASRN 112-34-5);
 - v. Ethylene glycol monopropyl ether (CASRN 2807-30-9);
 - vi. Propylene glycol monomethyl ether acetate (CASRN 108-65-6);
 - vii. 1,2,3-Trimethylbenzene (CASRN 526-73-8);
 - viii. 1,2-Dichlorobenzene (CASRN 95-50-1);
 - ix. Ethylene glycol monobutyl ether (CASRN 111-76-2);
 - x. Ethylene glycol (CASRN 107-21-1); and
 - xi. Nickel and compounds (CASRN 7440-02-0).

Biomass One Response: These references on the ACUTE tab have been adjusted to properly read these TACs on the ER-ST sheet. Some of these TACs do not have an acute RBC, so will not appear on the ACUTE REER tab. These changes can be seen in Appendix E.

If you have any questions please contact Kurt Lumpkin at klumpkin@biomassone.com or Beth Ryder at bRyder@trinityconsultants.com.

Sincerely,



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