Arctic Engineering
ENGINEERS - CONSULTANTS

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November 11th, 2025

Oregon Department of Environmental Quality (ODEQ)
Cleaner Air Oregon (CAO) Program
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232
Sent Electronically Only

Attention: Ms. Dana Corkill –
CAO Project Engineer
E-Mail: Dana.Corkill@deq.oregon.gov
Phone: (971) 263-9350

Subject: Pacific Wood Laminates, Inc.(PWL) CAO Emission Inventory (AQ520) Status Update and Request for Extension.

ODEQ Title-V Permit #08-0003-TV-01

Dear Ms. Corkill:

We hope this letter finds you well.

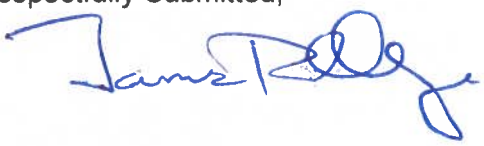
On behalf of PWL, Arctic Engineering. LTD. (AE) is informing you of an unforeseen circumstance to the submittal of PWL's CAO Emissions Inventory Form (AQ520). Mr. Daniel George, PWL's General Manager, will be admitted to Oregon Health Science University (OHSU) in Portland here this coming Thursday, November 13th, 2025, for emergency surgery to repair damage to his vertebral column, specifically damage to cervical vertebrae (C6 – C8).

It is unknown as to when exactly Mr. George will be physically returning to his duties at Pacific Wood Laminates, Inc. located in Brookings, Oregon. Mr. George communicated his situation and pending surgery to Mr. James DeHoog of Arctic Engineering (AE) at approximately 12:02 PM on November 11th, 2025, via telephonic conversation.

Given the above - Mr. George's pending surgery and unknown timeline for the recovery process - PWL would like to request a forty-five (45) day extension to the deadline of December 4th, 2025 for submittal of PWL CAO Emission Inventory Form (AQ520). PWL and AE officially request January 19th, 2026 as the new due date for the PWL CAO Emission Inventory (AQ520).

We have included in attachment "A" a project outline that shows items PWL's Management Team and its consultant Bison Engineering, Inc. have completed to date. While much has been accomplished, there still remains a significant amount to complete. Should you have any questions or have additional concerns regarding this matter, please feel free to contact me directly at (541) 601-9469.

Respectfully Submitted,



Mr. James DeHoog
Senior Environmental Engineer
Arctic Engineering, LTD. (AE)

cc:

Mr. Daniel George, PWL General Manager
Mr. Michael Bruggeman, PWL Technical Director
Ms. Laura McWhorter, DEQ

Attachment A:

Pacific Wood Laminates, Inc.
CAO Emission Inventory (AQ520):
Progress & Items Outstanding

Pacific Wood Laminates – Project Status 11/13/2025

Items that are included in the submittal

- **AQ520 Form (Emissions Inventory)**
- **EI Report**

AQ520 Form:

- 2. Emissions Units & Activities
  - Complete.
    - PH2 (boiler), Dryers, and Presses
- 3. Pollutant Emissions EF
  - Complete, need to review for accuracy.
- 4. Material Balance Activities
  - Spray paint, Plywood Layup, and LVL are listed
    - Need to review for accuracy and completeness.
- 5. Pollutant Emissions – MB
  - Needs review for accuracy and completeness.
- Dioxins and Furans
  - Complete.
- Example Calculations
  - Emissions calcs for boiler, dryers, and presses.
- Mlb steam to MMBtu Calc
  - Showing the conversion
- Welding Data
  - Goes through the calcs with emission factors from AP-42 and SDAPCD
  - The table at the top compares the usage to the threshold listed in Appendix B of the CAO Exempt TEU documentation

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- **NEED:**
  - Spray paint example calcs
  - LVL example calcs
  - Plywood layup example calcs
  - Maintenance Shop Calculations and Write-Up
  - Written Emissions Inventory Report –
    - Review all sources
    - Need to include the maintenance shop details after calculations are completed.