



January 21, 2021

Scott Austin

Scott.Austin2@gapac.com

Georgia-Pacific – Toledo LLC

1400 SE Butler Bridge Rd

Toledo, OR 97391-1900

Sent via EMAIL

Re: Round 2 Regional Haze Program, Preliminary Determination of Cost Effective Controls;
Georgia-Pacific – Toledo LLC, 21-0005

Dear Scott Austin:

Thank you for your responses to Department of Environmental Quality's (DEQ) December 23, 2019 request for four factor analysis for your facility, and DEQ's request for additional information on August 14, 2020, as DEQ gathered information on how to fulfill Round 2 of the Regional Haze Program in Oregon.

Based on the information provided in the four factor analysis, the cost information that you submitted, the additional information you provided, and the process DEQ is proposing to use to screen facilities, DEQ estimates the following controls are likely to be required at your facility:

Emissions Unit	Control Device	Target Pollutant
EU-118 Hardwood Chip handling	Baghouse	PM10
EU-1 Lime Kiln	LNB	NOx
EU-2 Lime Kilns	LNB	NOx
EU-3 Lime Kiln	LNB	NOx
EU-11 No. 4 Boiler	SCR	NOx
EU-13 No. 1 Boiler	SCR	NOx
EU-18 No. 3 Boiler	SNCR	NOx

DEQ intends to proceed with a rulemaking that adopts the process for this analysis. If DEQ's proposed rules are approved by the Environmental Quality Commission, DEQ will likely require your facility to install these controls.

If you disagree with, or would like to discuss DEQ's preliminary determination as outlined in this letter, we encourage you to reach out to the DEQ now. After DEQ adopts rules, it intends to

impose Round 2 regional haze requirements promptly thereafter and without additional discussion to meet federal timelines for submission of the State Implementation Plan.

DEQ appreciates your commitment to protecting air quality and improving visibility in Oregon's Class 1 Areas. If you have any questions about the content of this letter or need technical assistance, please contact Michael Orman, at michael.orman@deq.state.or.us or 503-509-8623.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ali Mirzakhali', with a stylized, flowing script.

Ali Mirzakhali
Air Quality Division Administrator
Oregon Department of Environmental Quality

Cc: Karen Williams
Joe Westersund
Michael Orman
Michael Eisele
Claudia Davis