



Oregon

Kate Brown, Governor

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January 23, 2020

Collins Pine Company
1600 Missouri Avenue
Lakeview, OR 97630

Mr. Hughes,

DEQ appreciates the submittal of the Cleaner Air Oregon Air Toxics Emissions Inventory Form AQ405CAO for the Collins Pine facility in Lakeview, OR. DEQ received your submittal on November 25, 2019 and has completed an initial review.

Based upon this review, DEQ has identified items to clarify in your November 25, 2019 submittal. **According to OAR 340-245-0030(2), DEQ is requesting you submit additional information to continue our review of your emissions inventory by no later than February 24, 2020.**

Specific Comments

1. Kiln emission factors are dependent on kiln operating temperatures. Please provide a discussion for DEQ review of how kiln temperatures are monitored onsite to substantiate that the kilns operate at or below 200 degrees Fahrenheit.
2. Maximum annual throughput requested for kilns in the emissions inventory is not consistent with either the total potential annual throughput of 87,900 thousand board-feet per year (MBdft/yr) listed in the review report for the facility's current Air Contaminant Discharge Permit (ACDP) or the 70,000 MBdft/yr throughput identified in the facility's November, 2018 ACDP renewal application. The annual throughput limit requested in the emissions inventory is 100,000 MBdft/yr for the four kilns. It should be noted that DEQ will not allow a risk assessment to be completed based on activity levels that exceed those in the facility's permit.
3. Please revise the equation listed in footnote (f) of Table 1, Input Process Rates and Parameters. The equation is used to calculate total maximum daily kiln throughput, but the units in the first part of the equation are MBdft/yr, and no time unit conversion is presented.
4. Please provide safety data sheets for all materials listed in the material balance section of the emissions inventory for DEQ review.

Please note the following if you think some or all of this information should be treated as "Confidential Business Information":

In order for the DEQ to exempt Emissions Inventory submittal data not already publicly available, the DEQ must obtain the requested emissions information along with verification of this claim pursuant to OAR 340-214-0130, specifically sub-sections 2(b) and 3(a-e):

(2) If an owner or operator claims that any writing, as that term is defined in ORS 192.410, is confidential or otherwise exempt from disclosure, in whole or in part, the owner or operator must comply with the following procedures:

- (a) The writing must be clearly marked with a request for exemption from disclosure. For a multi-page writing, each page must be so marked.

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(b) The owner or operator must state the specific statutory provision under which it claims exemption from disclosure and explain why the writing meets the requirements of that provision.

(c) For writings that contain both exempt and non-exempt material, the proposed exempt material must be clearly distinguishable from the non-exempt material. If possible, the exempt material should be arranged so that it is placed on separate pages from the non-exempt material.

(3) For a writing to be considered exempt from disclosure as a "trade secret," it must meet all of the following criteria:

(a) The information cannot be patented;

(b) It must be known only to a limited number of individuals within a commercial concern who have made efforts to maintain the secrecy of the information;

(c) It must be information that derives actual or potential economic value from not being disclosed to other persons; and

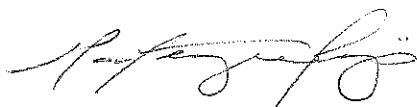
(d) It must give its users the chance to obtain a business advantage over competitors not having the information.

(e) It must not be emissions data.

Please communicate any questions or clarifications regarding the above comments proactively in order to provide a timely, revised submittal by February 24, 2020. DEQ remains available during this timeframe to discuss the submittal with you and answer any questions you may have. Failure to provide additional information or corrections requested by DEQ may result in a violation of OAR 340-245-0030(1) and OAR 340-245-0040(1).

Once DEQ receives a revised submittal with the requested information, we will complete our review of the emissions inventory. Please contact me directly at (503.229.5247, billings.kenzie@deq.state.or.us), and we look forward to your continued assistance with this process.

Sincerely,



Kenzie Billings
DEQ CAO Project Manager

Cc: Keith Johnson, DEQ
J.R. Giska, DEQ
Mark Bailey, DEQ
Paul DeVito, DEQ
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