



Oregon

Kate Brown, Governor

Department of Environmental Quality
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May 20, 2020

Collins Pine Company
1600 Missouri Avenue
Lakeview, OR 97630

Mr. Hughes,

DEQ appreciates the submittal of the Cleaner Air Oregon Modeling Protocol for the Collins Pine facility in Lakeview, OR. DEQ received your submittal on April 20, 2020 and has completed an initial review.

Based upon this review, DEQ has identified items to clarify in your April 20, 2020 submittal. **According to OAR 340-245-0030(2), DEQ is requesting you submit additional information to continue our review of your Modeling Protocol by no later than June 30, 2020.**

Specific Comments

1. Version 20060 of AERSURFACE was released on February 29, 2020. If additional model runs are needed for this risk assessment, please use the updated version.
2. The approved emissions inventory reports hexane emissions from annual and daily paint use of 20.4 lb/year and 0.0544 lb/day, respectively. The Modeling Protocol reports 24.0 lb/year and 0.064 lb/day. Please provide justification for this discrepancy.
3. The Modeling Protocol states that 2011-2015 was the most complete set of meteorological data, but that later years were used to supplement quarters during that period with less than 90% completeness. Please include the data completeness statistics for 2016-2018 to Table 4-3 to verify that 2011-2015 is the most complete set of meteorological data, and indicate the years and quarters of complete data that were used in the substitution.
4. The Modeling Protocol states that all kilns, including Kiln 4, are "indirectly heated by steam from the boilers." However, a heat source for Kiln 4 is not clearly identified on the process flow diagram. Please clarify the heat source for Kiln 4, and show on a revised process flow diagram.
5. DEQ understands that Kilns 1-3 have discrete stacks that discharge hot exhaust and Kiln 4 discharges through roof vents. In the Modeling Protocol, Kiln 4 is proposed to be modeled as a volume source; however, if Kiln 4 discharges hot exhaust, this may not be an appropriate assumption. Please provide justification for modeling Kiln 4 as a volume source.
6. The cemeteries to the north and east of the facility are not covered by the receptor grid. While we agree that risk does not need to be evaluated at this cemetery, the current figures imply that the cemeteries are within the facility boundary. DEQ requests placing receptors on the cemeteries and labeling them as receptors where risk is not evaluated.
7. On the northeast boundary of the facility, there appears to be a gravel pit that has been assigned a residential exposure. Residential exposure is acceptable due to the conservatism in this location, although a worker exposure appears to match the zoning.
8. Aerial imagery on the west side of the facility indicates a number of residences that are currently marked as worker receptors. Figure 4-7 indicates that some of these homes are located in an area zoned residential (west and northwest of the facility). All receptors that fall within the area zoned residential should be evaluated for residential exposure. Homes located in the area zoned 'central commercial' must also be evaluated for residential exposure. We have noted several receptors in

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an appendix that appear to fall on residential homes.

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 Modeling Protocol submittal data not already publicly available, the DEQ must obtain the requested 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.

(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 June 30, 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 Modeling Protocol. 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,

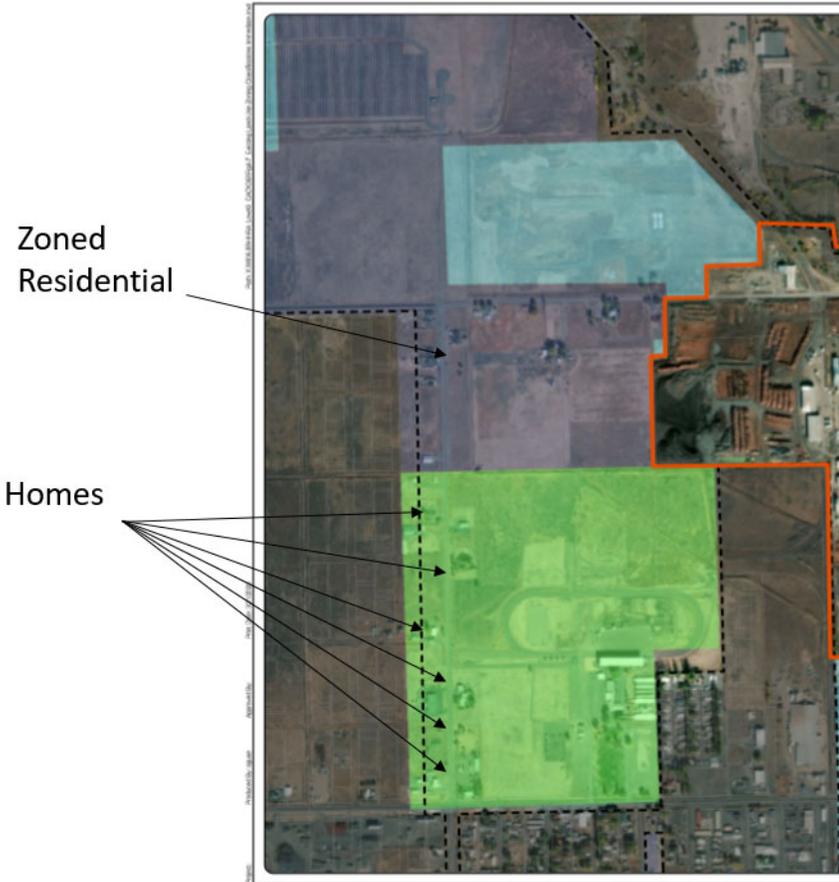
Kenzie Billings
DEQ CAO Project Manager

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Appendix: Potential Residential Home Receptors

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

Appendix: Potential Residential Home Receptors



Easting	Northing	Comment
717900	4675800	Residential
717925	4675775	Residential
717900	4675775	Residential
717925	4675800	Residential
717800	4675775	Residential
717800	4675800	Residential
717700	4675700	Residential
717700	4675675	Residential
717650	4675700	Residential
717600	4675800	Residential
717550	4675800	Residential
717500	4675800	Residential
717550	4675750	Residential
717500	4675750	Residential
717400	4675750	Residential
717450	4675750	Residential
717450	4675700	Residential
717400	4675700	Residential
717400	4675650	Residential
717400	4675600	Residential
717400	4675300	Residential
717450	4675200	Residential
717450	4675150	Residential
717500	4675200	Residential
717400	4675000	Residential
717500	4674850	Residential
717500	4674650	Residential