



Oregon

Kate Brown, Governor

Department of Environmental Quality
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March 25, 2021

Collins Pine Company
1600 Missouri Avenue
Lakeview, OR 97630

Mr. Hughes,

The Department of Environmental Quality (DEQ) has completed our review of the revised Modeling Protocol (Protocol) dated March 12, 2021 and revised Level 3 Risk Assessment Work Plan (Work Plan) dated July 25, 2020 submitted by the Collins Pine facility (Collins Pine) in Lakeview, OR as part of the Cleaner Air Oregon (CAO) program.

In accordance with OAR 340-245-0210(1), this letter provides written notice to you that DEQ has reviewed and approves the March 2021 Protocol and July 2020 Work Plan. DEQ delayed approval of your Work Plan in order to resolve items identified in previous correspondence in your Protocol. DEQ approves these submittals with the following items noted in your Work Plan:

1. **Section 5, Uncertainty Analysis, Acute Assessments:** DEQ expects the uncertainty section of the final risk assessment to include the clarification that a 24-hour average exposure duration does not necessarily overestimate acute risk. It may underestimate risk if the toxicity reference value (TRV) is based on a lower exposure duration, such as eight hours or one hour. For an exposure period shorter than 24 hours, maximum concentrations will likely be higher than the 24-hour average.
2. **Table 1, Summary of Risk Based Concentrations Included in the Risk Assessment:** This table quotes OAR 340-245-8040 Table 4 (Table 4) in showing that antimony does not have an acute risk-based concentration (RBC). During our review of this table, we discovered that this is an error in Table 4. Antimony has an acute TRV of 1 microgram per cubic meter ($\mu\text{g}/\text{m}^3$) in OAR 340-245-8030 Table 3. The value of 1 $\mu\text{g}/\text{m}^3$ should be used as the acute RBC for antimony. DEQ issued a revised spreadsheet of TRVs and RBCs with corrections.

The next step in the CAO process is to submit a Level 3 Risk Assessment to DEQ no later than July 23, 2021. Please refer to our [Step-by-Step Guide for Facilities](#) webpage for Risk Assessment resources.

Please contact me directly at (503.229.5247, billings.kenzie@deq.state.or.us) with any questions.

Sincerely,

Kenzie Billings
DEQ CAO Project Manager

19-0002 Collins Pine

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File