



**STIMSON LUMBER COMPANY**  
**Environmental Management**  
9400 SW Barnes Road, Ste 530  
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(503) 306-4655

20 January 2023

Ms. Julia Degagne  
Air Toxics Program Manager  
Oregon Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, Oregon 97232

**Re: Stimson Lumber Company Forest Grove Complex – Response to CAO Emissions Inventory:  
Revisions Dated December 22, 2022**

Dear Ms. DeGagne:

Stimson Lumber Company (Stimson) timely submits this response to DEQ's response to Cleaner Air Oregon (CAO) emissions inventory via email correspondence delivered on December 22, 2022 (response letter). As part of the response letter, DEQ requested that Stimson provide the following materials no later than January 20, 2023: revised emissions inventory (AQ520 form), supporting calculations, and supporting documentation. Each of these materials have been prepared in accordance with the required updates as identified in the response letter. In addition to these materials, we are providing DEQ with a copy of the revised emission calculation spreadsheet in PDF format.

We would note that in some instances, Stimson does not agree with the approach requested by DEQ, however, for the sake of progressing through the CAO permitting program, we have followed DEQ's suggestions. For instance, the technical data sheet for the BGEN catalytic converter suggests particulate control of up to 40%. Correspondence with the manufacturer indicates that 25% is typical. Stimson chose to use the conservative 20%, but this was not satisfactory to DEQ and there was an implied threat that anything short of assuming no control would result in DEQ imposing that assumption. Such an approach ignores the best available information. However, it aligns with a similar pattern adopted by DEQ throughout the process. Further, Stimson has been dissatisfied with DEQ's approach to issues that are typically considered insignificant but has acquiesced in order to avoid further conflict.

That said, Stimson has made a good faith effort to respond to all of DEQ's requests. Please contact me if you have any questions about the responses provided.

Sincerely,

STEVEN A. PETRIN  
Stimson Lumber Company

Attachments: Attachment A – Revised Emissions Calculation Spreadsheet  
Attachment B – AQ520 Form  
Attachment C – WATER9 native input files

C: Brian Bartlett, Stimson Lumber Company  
Patty Jacobs, DEQ