

**From:** [DEGAGNE Julia \\* DEQ](#)  
**To:** [Steven Petrin](#); [arogers@maulfoster.com](mailto:arogers@maulfoster.com); [bbartlett@stimsonlumber.com](mailto:bbartlett@stimsonlumber.com)"  
**Cc:** [JACOBS Patty \\* DEQ](#)  
**Subject:** RE: CAO Emissions Submittal - Stimson Lumber Company Forest Grove Complex  
**Date:** Tuesday, February 21, 2023 4:39:34 PM  
**Attachments:** [image002.png](#)  
[AttB\\_AQ520Form\(Jan20\)\\_DEQ.xlsx](#)  
[WATER9.zip](#)

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Hi Steven and team,

Thank you for your revised CAO Emissions Inventory, submitted January 20, 2023. I've finished reviewing and have made some edits, mostly for consistency with the supporting calculations and modeling. Please review the yellow-highlighted cells in the attached AQ520 and the list below (including one question for you), and let me know by **March 3, 2023** if you agree with the changes, or would like to discuss. Then, I will be able to send a letter approving this version of the Inventory.

These are the updates I made, and one question:

- Tab 3, TEU SCR\_HYDRO: acetaldehyde (CASRN 75-07-0) emissions have been updated for consistency with the WATER9 model output of 1.53E-5 g/s, as reported in the "acet\_e.prn" and "acet\_r.prn" files.
- Tab 3, TEU MACH: Emissions for all TACs have been updated to match the supporting calculations ("Final CAOEI FGC (Jan20).xlsx", HB\_WW tab) and the WATER9 model output, as reported in the ".prn" files.
- Tab 3, TEUs WHITE, MACH, HEAD, HYDRO, SURGE, ABASE, CLAR, S\_POND, R\_POND, E\_POND: Emissions for acetone (CASRN 67-64-1) have been updated. The WATER9 model run appears to have not captured acetone emissions correctly. Please review the attached updated WATER9 files to confirm the updated outputs (inputs have not been changed).
- Tab 3: TEUs using the AP-42 Chapter 7 methodology for tank emissions estimates and TEUs using the WATER9 model for emissions estimates have had the emission factors removed. I realize that I asked for emission factors to be included in a previous comment response – but, I agree with your initial submittals that these emissions are best represented by the modeling, and have learned that EFs need not be included on the AQ520 form in these cases.
- **Question:** We reviewed the full 2010 source test and noted that the hourly production rate of 7.3 ODT/hr used to develop the emission factor (see footnote c on Table 15 of the supporting calculations) is not documented in that test. There is a refiner production rate of 8.66 "tons per hour" listed on p. 167 - I'm not sure if this is oven-dried tons or not. Can you tell me how the 7.3 ODT/hr was determined from the 2010 source test data, and if the 8.66 ton/hr value would be a more appropriate production rate? The emission factors and emissions in the EI seem to be conservative based on the source test and expected capacity of the equipment, so we will not require any changes to the emission factor - I'd just like to document the source of the production rate used.

Thank you for your patience and assistance throughout this process.

Sincerely,



Julia DeGagné (she/her)  
Air Toxics Project Manager  
Oregon Department of Environmental Quality  
700 NE Multnomah St. Ste 600  
Portland, OR 97232  
Cell: 503-866-9643

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**From:** Andrew Rogers <arogers@maulfoster.com>  
**Sent:** Friday, January 20, 2023 3:18 PM  
**To:** DEGAGNE Julia \* DEQ <Julia.DEGAGNE@deq.oregon.gov>  
**Cc:** Steven Petrin <spetrin@stimsonlumber.com>; Brian Bartlett <bbartlett@stimsonlumber.com>  
**Subject:** RE: CAO Emissions Submittal - Stimson Lumber Company Forest Grove Complex

Hi Julia,

On behalf of Stimson Lumber Company, we are submitting the following materials to DEQ to satisfy the request in the email dated December 22, 2022:

1. Emissions calculation workbook
2. AQ form 520
3. Native WATER9 model files

In addition to these materials, please see the attached cover letter prepared by Stimson.

If you have any questions about any of these documents, please let me or Stimson know.

If you don't mind responding to confirm you received the documents, that would be much appreciated.

Thanks!

**Andrew Rogers, MEM** | MAUL FOSTER & ALONGI, INC.

*Project Meteorologist*

*pronouns: he/him/his*

m. **503 407 6406**



6 Centerpointe Drive, Suite 360 Lake Oswego, OR 97035  
[www.maulfoster.com](http://www.maulfoster.com)