



STIMSON LUMBER COMPANY
Environmental Management
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(503) 306-4655

18 April 2022

Ms. Julia DeGagné
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR 97232-4100

Ms. DeGagné:

This letter is in response to your information request dated 1 March 2022. Our responses are keyed to the numbered requests:

1. Process flow diagrams are attached. (all documents via email)
2. Additional information is in the emissions inventory.
3. Stimson currently has no information available to generate the requested fugitive emissions other than resin tanks. We have been unable to find any characterization of the other listed sources. We do not anticipate anything significant from the refiners as these have either no emissions or are controlled by Scrubber 5. We are not aware of any information available for the Forming line other than our own source sampling or equivalent discrete discharges. We have used the site specific information we have. We are also not aware of any information that pertains to the hydrosieves used to remove solids from some wastewaters. Additional work would need to be done to characterize these sources but any theoretical emissions are “fugitive” partly because they would be difficult to characterize.
4. The only significant change to the hardboard process has been the installation of the PCWP NESHAP systems on the press vent and refiners. This system would also capture emissions that would have previously been fugitives and are now routed through Scrubber 5. This entailed the installation of capture and routing of the emissions through a wet scrubber system and associated package WWTP. Historically, there may have also been some changes associated with the use of heated wax tanks (now discontinued), though we do not currently know of any emissions from that system.
5. Press acetone and acetaldehyde have been added to the inventory.
- 6.a. Refiner and former acetone and acetaldehyde emissions have been added to the inventory.
- 6.b. See attached table for emission factor derivation from 2007 source test.
- 7.a. The Title V application documents note a rated capacity of the fuel dryer of six units per hour. We see no mention of dry tons and other means of estimating the throughput are close to an assumption of six green units. The emissions inventory has been update to reflect this, conservatively assuming 50% moisture, which is equivalent to 4.32 ODT/hr.
- 7.b. The fuel dryer emission factors have been updated using the NCASI database. The hierarchy for selection based on selecting EFs is: 1) wood-fired green pre-dryer, 2) wood-fired green dryer, and 3) rotary dryers. Emission factors for TACs that are byproducts of combustion are not applied to the fuel dryer because emissions of these TACs are already accounted for at Boiler emissions emitted at the wet scrubber. This approach prevents double-counting. Note that these are still conservative emission factors because the fuel dryer only reduces moisture to approx.

40% instead of less than 30% (predryer) or 10% (green dryer). The size of the material dried also differs from PB rotary dryers, and because the material is larger you would expect emissions to be lower.

8.a. The emission factors have been updated to those in NCASI Technical Bulletin 1050.

8.b. The FHISOR has been updated as requested.

9. Kiln emission factors have been updated. Stimson, however, does not agree with the approach taken in AQ-EF09. DEQ has recommended dropping the small scale kiln bias factor introduced by EPA at Stimson's recommendation. The stated reason is use of a southern pine species and limited data. The data is limited but that does not justify ignoring it. That is the data available and it clearly shows a high bias from the OSU kiln. We have corrected the ODEQ factors with the use of the small scale kiln bias factor. However, the tables below show results from both the DEQ factors in AQ-EF09 and our adjusted emissions factors:

| | Douglas Fir | | Hemlok | | True Fir | |
|-----------------|-------------|---------|---------|---------|----------|-------|
| | DEQ | ADJ | DEQ | ADJ | DEQ | ADJ |
| Acetaldehyde | 6,284.9 | 3,770.9 | 3,435.4 | 2,061.3 | 186.1 | 111.7 |
| Acrolein | 116.9 | 78.0 | 54.8 | 36.6 | 6.1 | 4.1 |
| Formaldehyde | 306.9 | 226.5 | 64.0 | 47.2 | 24.7 | 18.2 |
| Methanol | 9,178.8 | 8,361.9 | 3,350.2 | 3,052.0 | 776.6 | 707.5 |
| Propionaldehyde | 131.5 | 43.8 | 36.5 | 12.2 | 4.1 | 1.4 |

10. The facility has gone to a single product (Anti-Blu M6) for surface protection. The requested SDSs are attached.

11. Production values have been updated.

12.a. See attached for WATER 9 input files.

12.a-e. Sampling results, throughput verification, and a WWTP PFD are attached.

12.f. Emissions have been updated.

13. TEU Form AQ523 is attached.

14. Emissions inventory has been revised to include BGEN and fire pump diesel engines.

15. DEQ Form AQ520 updated except for outstanding items in list above.

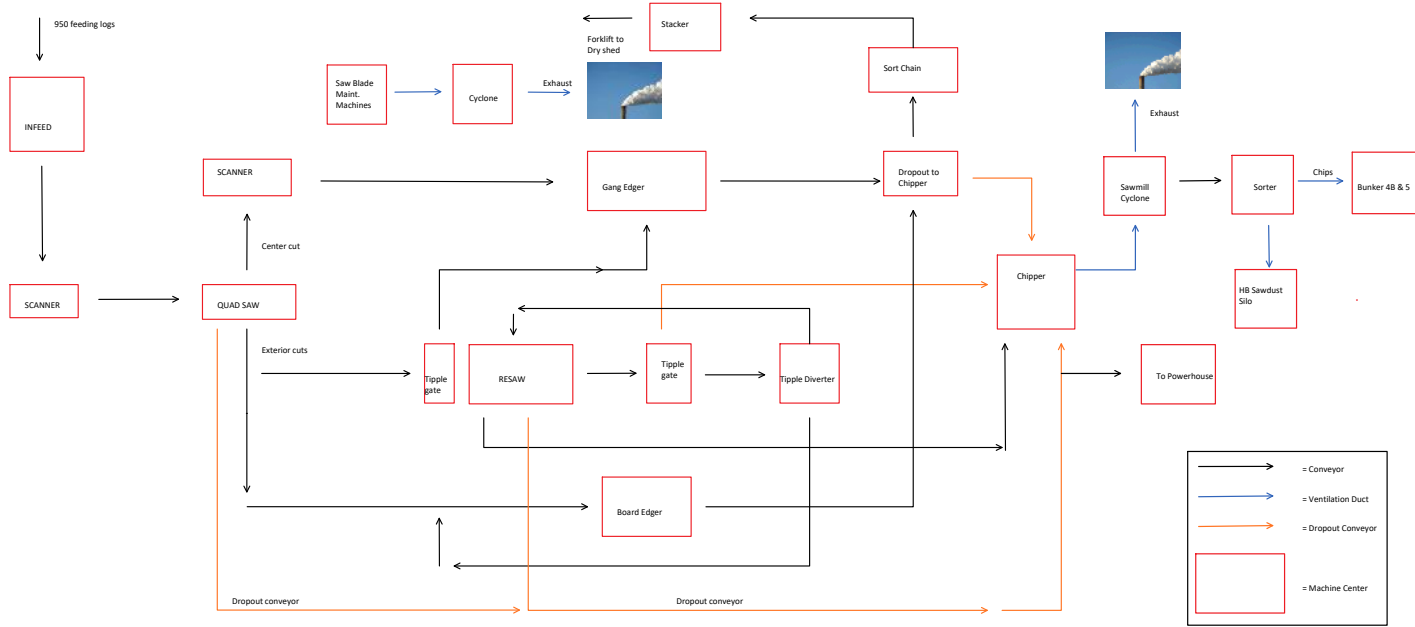
In some cases we would have liked to review some of the numbers further but this took the full time allotted -- we may yet submit revisions. Please feel free to contact me 503-306-4655 or spetrin@stimsonlumber.com with any questions.

Sincerely,

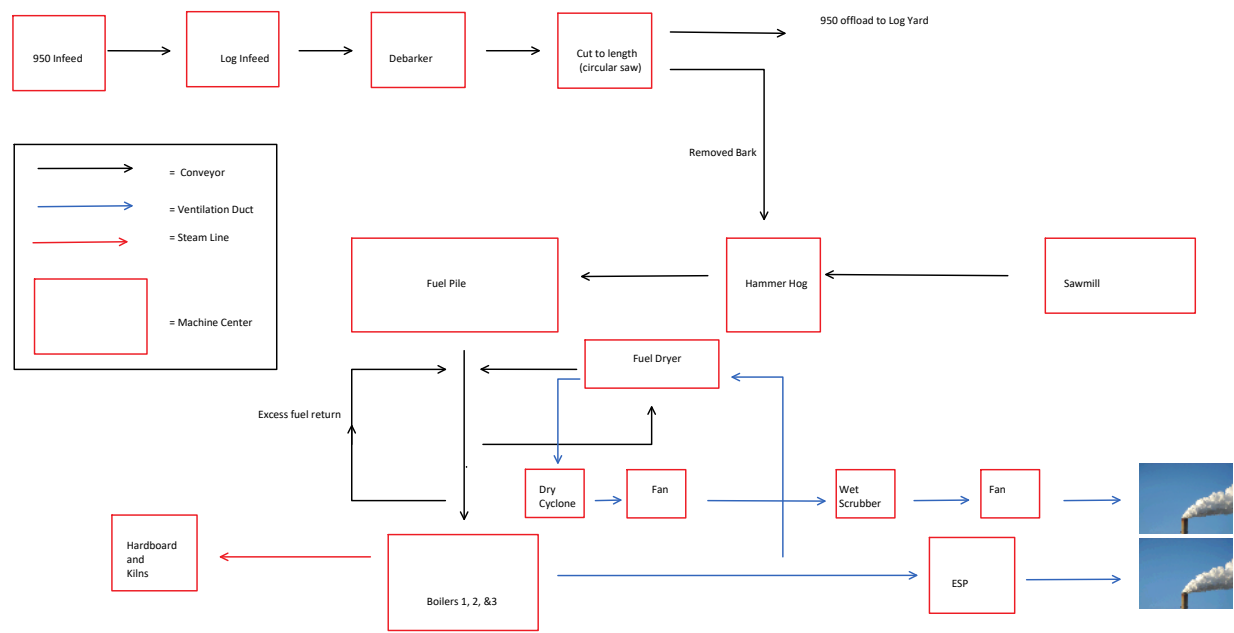


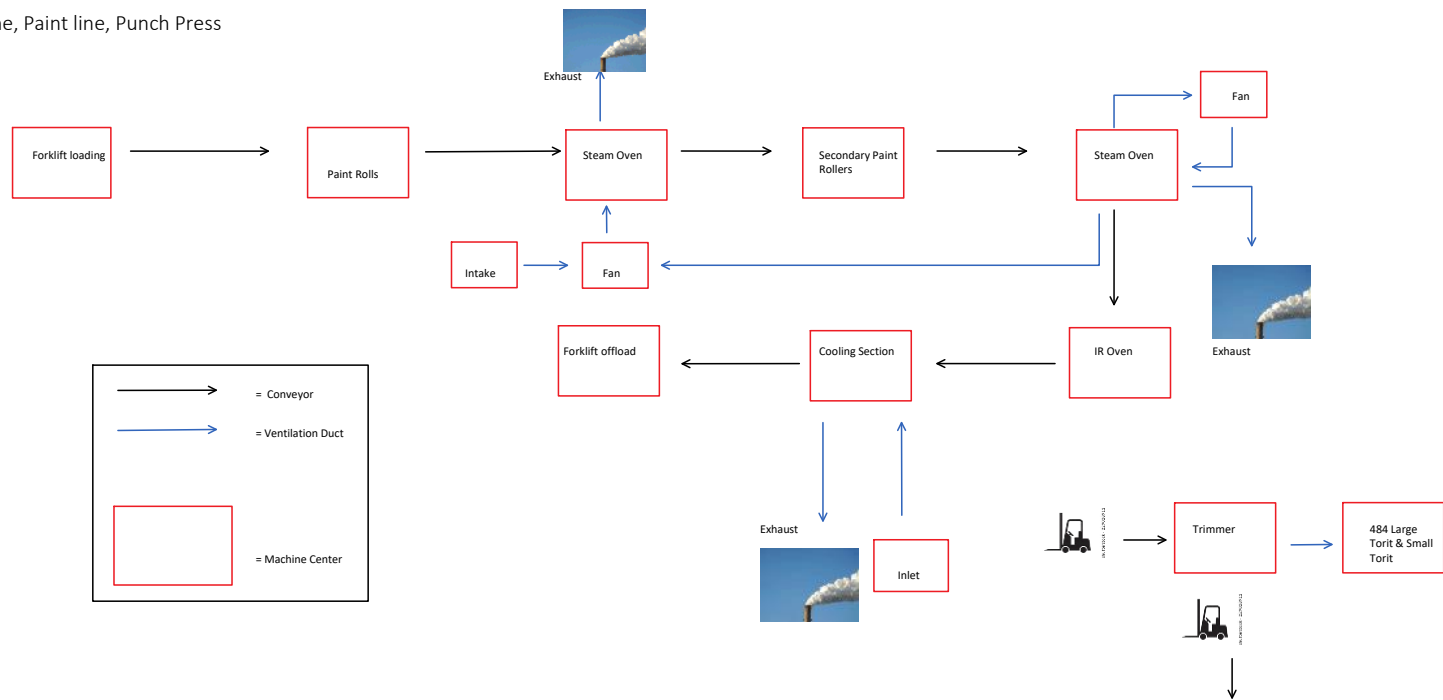
STEVEN A. PETRIN
Environmental Manager

C: B. Bartlett -- Gaston, OR



Debarker and Powerhosue





**CATEGORICALLY EXEMPT TOXICS EMISSIONS UNITS****ANSWER SHEET**

Facility name: _____ Permit Number: _____

Indicate which of the following categorically exempt activities occur at this facility by checking the appropriate columns below. Submit this form electronically with your Cleaner Air Oregon (CAO) Emissions Inventory AQ520 form to meet the reporting requirements in [OAR 340-245-0040\(4\)\(a\)\(A\)](#) for categorically exempt Toxics Emissions Units (TEUs). This form is the complete list of categorically exempt TEUs, which can be found in the division 245 rules under [OAR 340-245-0060\(3\)\(b\)](#).

| Yes | No | Categorically Exempt TEU Activities |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | Evaporative and tail pipe emissions from on-site motor vehicle operation. |
| <input type="checkbox"/> | <input type="checkbox"/> | Distillate oil, kerosene, gasoline, natural gas or propane burning equipment, provided the aggregate expected actual emissions of the equipment identified does not exceed the de minimis level for any regulated pollutant, based on the expected maximum annual operation of the equipment. If a source's expected emissions from all such equipment exceed the de minimis levels, then the source may identify a subgroup of such equipment as categorically exempt with the remainder not designated as an exempt TEU. The following equipment may never be included as part of the exempt TEU: A. Any individual distillate oil, kerosene or gasoline burning equipment with a rating greater than 0.4 million Btu/hour; and B. Any individual natural gas or propane burning equipment with a rating greater than 2.0 million Btu/hour. |
| <input type="checkbox"/> | <input type="checkbox"/> | Distillate oil, kerosene, gasoline, natural gas or propane burning equipment brought on site for six months or less for maintenance, construction or similar purposes, such as but not limited to generators, pumps, hot water pressure washers and space heaters, provided that any such equipment that performs the same function as the permanent equipment, must be operated within the source's existing PSEL. |
| <input type="checkbox"/> | <input type="checkbox"/> | Office activities. |
| <input type="checkbox"/> | <input type="checkbox"/> | Food service activities. |
| <input type="checkbox"/> | <input type="checkbox"/> | Janitorial activities. |
| <input type="checkbox"/> | <input type="checkbox"/> | Personal care activities. |
| <input type="checkbox"/> | <input type="checkbox"/> | Grounds keeping activities, including, but not limited to building painting and road and parking lot maintenance. |
| <input type="checkbox"/> | <input type="checkbox"/> | On-site laundry activities. |
| <input type="checkbox"/> | <input type="checkbox"/> | On-site recreation facilities. |
| <input type="checkbox"/> | <input type="checkbox"/> | Instrument calibration. |
| <input type="checkbox"/> | <input type="checkbox"/> | Automotive storage garages. |

| | | |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | Refrigeration systems with less than 50 pounds of charge of ozone depleting substances regulated under Title VI, including pressure tanks used in refrigeration systems but excluding any combustion equipment associated with such systems. |
| <input type="checkbox"/> | <input type="checkbox"/> | Temporary construction activities. |
| <input type="checkbox"/> | <input type="checkbox"/> | Warehouse activities. |
| <input type="checkbox"/> | <input type="checkbox"/> | Accidental fires and fire suppression. |
| <input type="checkbox"/> | <input type="checkbox"/> | Air vents from compressors. |
| <input type="checkbox"/> | <input type="checkbox"/> | Air purification systems. |
| <input type="checkbox"/> | <input type="checkbox"/> | Continuous emissions monitoring lines. |
| <input type="checkbox"/> | <input type="checkbox"/> | Demineralized water tanks. |
| <input type="checkbox"/> | <input type="checkbox"/> | Pre-treatment of municipal water, including use of deionized water purification systems. |
| <input type="checkbox"/> | <input type="checkbox"/> | Electrical charging stations. |
| <input type="checkbox"/> | <input type="checkbox"/> | Fire brigade training. |
| <input type="checkbox"/> | <input type="checkbox"/> | Instrument air dryers and distribution. |
| <input type="checkbox"/> | <input type="checkbox"/> | Fully enclosed process raw water filtration systems. |
| <input type="checkbox"/> | <input type="checkbox"/> | Electric motors. |
| <input type="checkbox"/> | <input type="checkbox"/> | Pressurized tanks containing gaseous compounds that do not contain toxic air contaminants. |
| <input type="checkbox"/> | <input type="checkbox"/> | Vacuum sheet stacker vents. |
| <input type="checkbox"/> | <input type="checkbox"/> | Emissions from wastewater discharges to publicly owned treatment works (POTW) provided the source is authorized to discharge to the POTW, not including on-site wastewater treatment and/or holding facilities. |
| <input type="checkbox"/> | <input type="checkbox"/> | Log ponds. |
| <input type="checkbox"/> | <input type="checkbox"/> | Stormwater settling basins. |
| <input type="checkbox"/> | <input type="checkbox"/> | Paved roads and paved parking lots within an urban growth boundary. |
| <input type="checkbox"/> | <input type="checkbox"/> | Hazardous air pollutant emissions in fugitive dust from paved and unpaved roads except for those sources that have processes or activities that contribute to the deposition and entrainment of hazardous air pollutants from surface soils. |
| <input type="checkbox"/> | <input type="checkbox"/> | Health, safety, and emergency response activities. |
| <input type="checkbox"/> | <input type="checkbox"/> | Non-diesel, compression ignition emergency generators* and pumps used only during loss of primary equipment or utility service due to circumstances beyond the |

| | | |
|--------------------------|--------------------------|---|
| | | reasonable control of the owner or operator, or to address a power emergency, provided that the aggregate horsepower rating of all stationary emergency generator and pump engines is not more than 3,000 horsepower. If the aggregate horsepower rating of all the stationary emergency generator and pump engines is more than 3,000 horsepower, then no emergency generators and pumps at the source may be considered categorically exempt. *All spark ignition engines remain exempt. |
| <input type="checkbox"/> | <input type="checkbox"/> | Non-contact steam vents and leaks and safety and relief valves for boiler steam distribution systems. |
| <input type="checkbox"/> | <input type="checkbox"/> | Non-contact steam condensate flash tanks. |
| <input type="checkbox"/> | <input type="checkbox"/> | Non-contact steam vents on condensate receivers, deaerators and similar equipment. |
| <input type="checkbox"/> | <input type="checkbox"/> | Boiler blowdown tanks. |
| <input type="checkbox"/> | <input type="checkbox"/> | Ash piles maintained in a wetted condition and associated handling systems and activities. |