



STIMSON LUMBER COMPANY
Environmental Management
9400 SW Barnes Road, Ste 530
Portland, Oregon 97225
(503) 306-4655

29 July 2022

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

Re: Request for extension of Response Deadline

Dear Ms. Degagne:

Stimson has been working on responses to your letter of 30 June 2022. As per our previous discussions, Stimson intends to respond to some of the requests for additional characterization of emissions through the use of water testing as inputs to emissions modeling. However, we have encountered some unanticipated delays and, as a result, are requesting an extension of time to respond in accordance with OAR 340-245-0030(3).

In relation to the showings needed for an extension, a delay is needed to “to obtain more accurate or new data” or “additional analysis is needed.” Our initial round of testing has turned out to need repeating due to the lab supplying the wrong bottles for the tests. Added to this delay has been the need to shut down the hardboard production line temporarily due to problems with the NESHAP monitoring system. We cannot properly sample the white water flow while the hardboard plant is shut down. We further note that there are scheduling issues associated with the short hold times for formaldehyde.

Relative to demonstrating progress in completing the submittal, Stimson has already drafted responses to many of the requests, including related to the boilers and fuel dryer, auxiliary engines, and other sources. Given the difficulties with the water sampling Stimson is requesting a two week extension to 29 August 2022 for our response to those portions of the information request that depend upon the water sampling results. The partial response by the original date of 15 August will be further demonstration of progress.

Note that the final revised inventory will need to await analysis and processing of the water results as the emissions estimates to complete that will depend upon the sampling results.

Please feel free to contact me with any questions or comments about this request.

Sincerely,

STEVEN A. PETRIN
Environmental Manager