

## [TLCO Office] Fwd: Pre-Enforcement Notice

1 message

Cynt George &lt;goinggreenwest@gmail.com&gt;

Wed, Dec 31, 2025 at 5:22 A

To: Kenneth Lipp &lt;klipp@co.lincoln.or.us&gt;, boc &lt;BOC@co.lincoln.or.us&gt;, Rep Gomberg &lt;Rep.DavidGomberg@oregonlegislature.gov&gt;, tlco.office@lincoln.k12.or.us

This is to inform you once again that your placement of the Low income housing project in Toledo Oregon is poor placement subjected children to potentially over 600 deadly chemicals under extreme study by Oregon for its potential health risks. We already see the high cancer rates and more young ones diagnosed and they were in those classrooms under those deadly stacks. It has also been discovered GP released deadly discharges at night while the town slept so less workers were effected.

If you live here in the discharge flow , you know they still practice the same night load. These discharges can just sit on the town and particularly our childrens schools. It is time to demand real time monitoring and even checking level in the people to the heavy metals and toxin exposure since 1958.

This is a special call out to Lincoln County School Board to demand testing of those schools exposure.

----- Forwarded message -----

From: Cynt George &lt;goinggreenwest@gmail.com&gt;

Date: Tue, Dec 30, 2025 at 2:06 PM

Subject: Fwd: Pre-Enforcement Notice

To: &lt;nwcoastalhousing@gmail.com&gt;

Your housing site is not healthy nor safe under a Georgia Pacific discharge pipe emmitting over 600 poisons and failing to follow the law while we sleep.

Consider this a legal notice of standing idf you choose to violate common decency for fraud and greed.

----- Forwarded message -----

From: EISELE Michael \* DEQ &lt;Michael.EISELE@deq.oregon.gov&gt;

Date: Tue, Dec 30, 2025 at 1:06 PM

Subject: Pre-Enforcement Notice

To: Cynt George &lt;goinggreenwest@gmail.com&gt;

Hi Cynthia,

It was good to talk to you today. Attached is the pre-enforcement notice that I recently sent GP. Also here is a link to enforcement actions [State of Oregon: Department of Environmental Quality](#). It is a bit clunky so I copied and pasted what you would want to see below. Note that the first item below is for the mill in Clatskanie not the mill in Toledo.

Enforcement Number	Program	Region	Source Name	Source Location	Enforcement Type	Violations	Issued	Penalty Amount
2021-125	AQ Permitting	NWR	Georgia-Pacific Consumer Operations LLC	CLATSANIE	Notice of Civil Penalty Assessment and Order			
2020-010	AQ Permitting	WR	Georgia Pacific Toledo LLC	TOLEDO	Notice of Civil Penalty Assessment and Order	HAP - Federal Regs adopted by reference, Criteria 5 - Violation of work practice standard, testing requirements, monitoring requirements, recordkeeping or reporting requirements; Criteria 5 - Violation of work practice standard, testing requirements, monitoring requirements, recordkeeping or reporting requirements; Criteria 5 - Violation of work practice standard, testing requirements, monitoring requirements, recordkeeping or reporting requirements; Criteria 5 - NESHAP, violation of emission limit, emission standard, surrogate parameter, for at least seven days; Criteria 4 - NESHAP, violation of emission limit, emission standard, surrogate parameter, for at least seven days; Criteria 2 - NSR/PSD/SIP, violation of emission limit, emission standard, or surrogate parameter, for at least seven days; Criteria 2 - NSR/PSD/SIP, violation of emission limit, emission standard, or surrogate parameter, for at least seven days; Criteria 1 - Violation of Work Practice Standard; 1- Violation of emission limit, emission standard, surrogate parameter; Major sources under CAA [OAR 340-218-0020 TV permit required]; Major sources under CAA [OAR 340-218-0020 TV permit required]; TRS, SO2, opacity, NSPS [OAR 340-234-0200 Wood - Kraft pulp mills]; TRS, SO2, opacity, NSPS [OAR 340-234-0200 Wood - Kraft pulp mills]; Reports criteria [OAR 340-212-0270 TV monitoring reports]; Design criteria [OAR 340-212-0210 TV monitoring design]; Design criteria [OAR 340-212-0210 TV monitoring design]	9/21/2020	\$63,600
2021-166	AQ Permitting	WR	Georgia Pacific Toledo LLC	TOLEDO	Notice of Civil Penalty Assessment and Order	Observable deposition of PM &gt;250 microns on a neighbor's property [OAR 340-208-0450 Deposition], TRS, SO2, opacity, NSPS [OAR 340-234-0200 Wood - Kraft pulp mills]; Criteria 4 - NESHAP, violation of emission limit, emission standard, surrogate parameter, for at least seven days	8/9/2022	\$62,304
2024-074	AQ Permitting	WR	Georgia-Pacific Toledo LLC	TOLEDO	Notice of Civil Penalty Assessment and Order	4 - NESHAP, violation of emission limit, emiss; HAP - Federal Regs adopted by reference; HAP - Federal Regs adopted by reference; HAP - Federal Regs adopted by reference; 3 - NSPS, violation of emission limit, emiss; TV monitoring reports; TV record keeping; 6- Failure to report as required by permit or regulation; HAP - Federal Regs adopted by reference; Wood - Kraft pulp millsAQPermitting - Failing to install control equipment, meet emission limits, operating limits, work practice requirements, or performance standards as required by New Source Performance Standards under OAR 340 division 238 or National Emission Standards for Hazardous Air Pollutant Standards under OAR 340 division 244; AQPermitting - Failing to install control equipment, meet emission limits, operating limits, work practice requirements, or performance standards as required by New Source Performance Standards under OAR 340 division 238 or National Emission Standards for Hazardous Air Pollutant Standards under OAR 340 division 244; Violating the terms or conditions of a permit or license, unless otherwise classified; Failing to perform testing or monitoring, required by a permit, permit attachment, rule or order, that results in failure to show compliance; AQPermitting - Failing to install control equipment, meet emission limits, operating limits, work practice requirements, or performance standards as required by New Source Performance Standards under OAR 340 division 238 or National Emission Standards for Hazardous Air Pollutant Standards under OAR 340 division 244; Failing to perform testing or monitoring, required by a permit, permit attachment, rule or order, that results in failure to show compliance; Violating the terms or conditions of a permit or license, unless otherwise classified; Failing to timely submit a certification, report, or plan as required by rule or permit, unless otherwise classified; Violating the terms or conditions of a permit or license, unless otherwise classified; Violating the terms or conditions of a permit or license, unless otherwise classified, 2 - Violation of Work Practice Standard; Subject to federal or state MACT applicability [OAR 340-244-0210 HAP - Existing sources], Design criteria [OAR 340-212-0210 TV monitoring design], Observable deposition of PM &gt;250 microns on a neighbor's property [OAR 340-208-0450 Deposition]	6/12/2025	\$116,108

Total Records: 4

Mike



# Oregon

Tina Kotek, Governor

## Department of Environmental Quality

Western Region Salem Office  
4026 Fairview Industrial Dr SE  
Salem, OR 97302  
(503) 378-8240  
FAX (503) 373-7944  
TTY 711

November 26, 2025

Mark Carden  
Georgia Pacific Toledo LLC  
1400 SE Butler Bridge Road  
Toledo, Oregon 97391

RE: Pre-Enforcement Notice  
Georgia Pacific Toledo LLC  
2025-PEN-10051  
21-0005-TV-01  
Lincoln County

Dear Mr. Carden:

On September 18, 2025, you sent DEQ an excess emission report in YDO, RID 73163. This excess emission report indicated the facility started exceeding the 33 tons/year 12-month rolling plant site emission limit for sulfur dioxide between August 1, 2024 and July 30, 2025. It also indicated the sulfur dioxide emissions were 40 tons/year for the period between September 1, 2024 and August 1, 2025. Then on October 10, 2025, Micah Leis sent me an email that included the table below of the 12-month rolling total SO<sub>2</sub> emission rates:

12-Month Rolling Total SO <sub>2</sub> Emissions on First Day of Month (tons/year)	
Aug-24	11
Sep-24	11
Oct-24	11
Nov-24	11
Dec-24	11
Jan-25	11
Feb-25	14
Mar-25	15
Apr-25	17
May-25	27
Jun-25	31
Jul-25	33
Aug-25	38
Sep-25	40
Oct-25	40

DEQ has concluded that Georgia Pacific Toledo LLC is responsible for the following violation of Oregon environmental law:

**VIOLATION:**

- (1) Exceeding the 12-month rolling plant site emission limit (PSEL) for sulfur dioxide. [Title V permit condition 91, OAR 340-222-0041] This is a Class I violation according to OAR 340-012-0054(1)(g).

Class I violations are the most serious violations; Class III violations are the least serious.

**Corrective Actions taken:**

DEQ understands you have updated the PSEL alarms and have lowered liquor sulfidity until an investigation into boiler reduction efficiency is completed.

Your timely and responsive action on these items will be taken into consideration in any civil penalty assessment issued by DEQ.

The violation cited above caused significant environmental harm or posed a risk of significant environmental harm and the matter is being referred to DEQ's Office of Compliance and Enforcement for formal enforcement action. Formal enforcement action may result in assessment of civil penalties and/or a Department order. A formal enforcement action may include a civil penalty assessment for each day of violation.

If you believe any of the facts in this Pre-Enforcement Notice are in error, you may provide written information to me at the address shown at the top of the letter or at [michael.eisele@deq.oregon.gov](mailto:michael.eisele@deq.oregon.gov). DEQ will consider new information you submit and take appropriate action.

DEQ endeavors to assist you in your compliance efforts. Should you have any questions about compliance or about the content of this letter, you may contact me at 503-378-5070 or [michael.eisele@deq.oregon.gov](mailto:michael.eisele@deq.oregon.gov).

Sincerely,

*Michael Eisele*

Michael Eisele, PE  
Environmental Engineer 3

cc: Zach Loboy, DEQ