



Oregon

Kate Brown, Governor

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Jan. 22, 2016

Ellen Porter
Director of Environmental Affairs
Roseburg Forest Products
PO Box 1088
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RE: Transferring ownership of BUD5: Beneficial Use Determination issued to Sierra Pine for Wet Scrubber Mud generated by the Medford MDF facility;
New owner – BUD 5: Roseburg Forest Products Medford MDF Facility Wet Scrubber Mud Beneficial Use Determination.

Dear Ms. Porter:

Thank you for the letter dated Dec. 3, 2015 notifying DEQ of the purchase of the Sierra Pine Medford Medium Density Fiberboard Facility by Roseburg Forest Products and requesting a transfer of the existing Beneficial Use Determination for Wet Scrubber Mud and waste fiber generated by the facility. The letter indicates that under RFP ownership, the manufacturing process will remain the same and the wet scrubber mud waste material and beneficial uses will remain the same. Amanda Orth confirmed these facts during a phone conversation with Bob Barrows on Dec. 15, 2015.

Given this information, DEQ is maintaining the approval for BUD 5 issued to Sierra Pine for Wet Scrubber Mud generated by the Medford MDF facility and renaming it BUD 5: Roseburg Forest Products Medford MDF Facility Wet Scrubber Mud. The BUD will remain in effect as long as the waste material composition remains the same and all conditions described in the original application and prescribed in the BUD remain the same. DEQ will not regulate wet scrubber mud waste as a solid waste as long as the waste is used in accordance with the beneficial use determination.

DEQ reviewed the original application and determined the proposal to beneficially use wet scrubber mud as saw dust replacement and wood chip substitute for: 1) agricultural and nursery soil amendment/mulch and 2) livestock bedding, meets the requirements for a case-specific beneficial use determination under Oregon Administrative Rules 340-093-0260 through 0290. The BUD is limited to the materials described in the original application and approved uses, and conditions specified in the table below. The conditions of the BUD are intended to prevent adverse affects to human health and the environment.

Solid Waste	Beneficial Use	Conditions on Use
Wet Scrubber Mud generated at Roseburg Forest Products Medford Medium Density	Livestock bedding, agricultural and nursery mulch/ soil amendment	<ul style="list-style-type: none"> - Users must be provided with a written description of the composition of the wet scrubber mud and a chemical analysis - Users must be provided with written guidance on appropriate management of scrubber mud including methods on how to prevent nuisance dust and specific appropriate agricultural use as mulch or soil amendment - Roseburg Forest Products must track the amounts and

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Fiberboard Facility		disposition of wet scrubber mud including name, address and phone number of users. The list must be kept for 10 years and made available to DEQ upon request.
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DEQ's determination is based on a review of whether the original application's proposed beneficial uses of wet scrubber mud meet the case-specific beneficial use performance criteria outlined in OAR 340-093-0290. Details of the DEQ review are provided in the attached, original case-specific evaluation and site visit report.

Regarding the use of wet scrubber mud as feedstock for composting facilities, DEQ determined a beneficial use determination is not necessary as the scrubber mud meets the Type 1 compost feedstock definition. The scrubber mud can be utilized as a feedstock at DEQ permitted composting sites.

Please note that this BUD covers only wet scrubber mud and no other waste generated by the Medford MDF Facility. The original application requested a determination of only the wet scrubber mud waste and DEQ's review and approval was and is confined only to wet scrubber mud. Contact DEQ for review of other waste for beneficial use determination.

If you have any questions about this BUD, please contact Bob Barrows at 541-687-7354 or Bill Mason at 541-687-7427.

Sincerely,



Brian Fuller, Manager,
Western Region Hazardous and Solid Waste Program

enc.

ec: File
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