



June 2, 2020

Kristana Becherer
Environmental Permitting and Compliance Manager
Roseburg Forest Products
3660 Gateway St
Springfield, OR 97477

Submitted via Email

Re: Round 2 Regional Haze Four Factor Analysis
Roseburg Forest Products – Medford MDF (15-0073)

Dear Kristana:

Thank you for your letter from May 12, 2020 regarding DEQ's request for a four factor analysis (FFA) for your facility.

The Regional Haze Rule (40 CFR 51.308) was issued as part of the Clean Air Act on July 1, 1999. The goal of the Regional Haze program is to improve visibility conditions in Class I Areas back to natural conditions by 2064. Regional Haze is a long-term program that sets goals for visibility improvement in 10-year periods of time from 2004 through to 2064, with interim checks on visibility conditions every 5 years.

The letter DEQ sent to you regarding four factor analysis on December 23, 2019, is part of Oregon's requirements for Round 2 of the Regional Haze program, as detailed in 40 CFR 51.308(f), for the period from 2021 to 2028. DEQ used the 2017 PSELs to screen Oregon Title V facilities for applicability to conduct four factor analyses for the 2018-2028 round of the Regional Haze Program under Clean Air Act 40 CFR 51.308(f). DEQ requested the four factor analysis under OAR 340-214-0110.

For reference, the facility's emissions are the following:

Plant Site Emission Limits (tons/year)

	NO _x	PM ₁₀	SO ₂	Total (Q)	d (km)	Q/d
2017 Actual	131.16	36.24	5.94	173.33	59.5	2.91
2017 PSEL (in Dec 2019 FFA letter)	272	215	39	526	59.5	8.84
2017 PSEL (renewal permit)	200	55	39	294	59.5	4.94
2017 Netting Basis (renewal)	396	214	39	649		
Unassigned emissions (2017 renewed permit)	196	169	0			

Based on the updated emissions information, DEQ's letter from April 22, 2020 requested that Roseburg Forest Products voluntarily reduce the unassigned emissions from the Medford facility's 2017 permit renewal to bring the unassigned emissions into alignment with the facility's actual potential to emit.

In your May 12, 2020 letter, you shared additional information on the existing controls at the Medford facility:

The Medford boiler is subject both to a 2016 LAER determination for PM₁₀ that involved replacement of an existing electrostatic precipitator with a new baghouse. As a result of the Plywood and Composite Woods Products NESHAP (PCWP MACT), the dryers and press are all routed to an RCO which is an extremely good control for particulate.

Any increase in emissions above the Plant Site Emission Limit including use of any unassigned emissions requires a permit modification in accordance with OAR 340-218-180 and modifications that involve NSR/PSD must obtain an ACDP prior to construction in accordance with OAR 340-224.

Given the total emissions of the facility below the screening threshold of 5.00 in the 2017 permit renewal, the additional information on controls cited above, and the unique circumstances of the facility due to its location within the Medford nonattainment area, DEQ agrees that this facility does not need to undergo a four factor analysis for this round of Regional Haze review.

DEQ may reopen any issued permit to include applicable requirements consistent with Oregon Regional Haze regulations. In alignment with 40 CFR 51.308, Oregon sources may be subject to reexamination of visibility impacts if new information warrants reassessment. This letter concludes the process for the Roseburg Forest Products – Medford MDF facility for the Second Planning Period of the Regional Haze Program.

Thank you again for your commitment to protecting air quality and improving visibility in Oregon's National Parks and Wilderness Areas. If you have any questions about the content of this letter or need technical assistance, please feel free to contact D Pei Wu, PhD, at wu.d@deq.state.or.us or 503-229-5269.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ali Mirzakhali', with a long horizontal flourish extending to the right.

Ali Mirzakhali
Air Quality Division Administrator
Oregon Department of Environmental Quality

CC: Michael Orman, Air Quality Planning Section Manager, DEQ
D Pei Wu, PhD, Air Quality Planner, DEQ
Byron Peterson, Natural Resource Specialist, Air Quality, Western Region, DEQ
Claudia Davis, Air Quality Manager, Western Region, DEQ
Tom Wood, Stoel Rives LLP
Chad Darby, Maul, Foster & Alonghi, Inc.