



Oregon

Kate Brown, Governor

Department of Environmental Quality
Agency Headquarters
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August 13, 2020

Timber Products Company
PO BOX 269
305 South 4th Street
Springfield, OR 97477

Submitted via Email

Re: Round 2 Regional Haze Four Factor Analysis
Timber Products Co (15-0025)

Dear Mr. Avery:

Thank you for your letter from June 9, 2020 regarding DEQ's December 2019 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.

As you state in your June 9, 2020 letter, your facility reduced the PSELs of Regional Haze pollutants for the facility to below the screening threshold of $Q/d \leq 5.00$ in May 2020 ($Q/d = 4.68$; see below). This also meets the requirement that any permit changes be fully completed before the State Implementation Plan submittal deadline in July 2021.

	2016 PSEL	2020 PSEL
NO_x	162	154
PM₁₀	159	85
SO₂	39	39 (PTE = 5)
Total (Q)	360	278
d	59.4 km	59.4 km
Q/d	6.07	4.68

For your reference, 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 will be below the screening threshold of 5.00 via permit renewal, and your voluntary acceptance of lower limitation of your unassigned emissions, DEQ agrees that this facility does not need to undergo a four factor analysis for Round 2 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 Timber Products Co LLC facility for the Second Planning Period of the Regional Haze Program.

We appreciate 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 blue ink, appearing to read 'Ali Mirzakhali', with a long horizontal flourish extending to the right.

Ali Mirzakhali
Administrator
Air Quality Division

CC: Michael Orman, Air Quality Planning Section Manager, DEQ
D Pei Wu, PhD, Air Quality Planner, DEQ
Byron Peterson, DEQ
Claudia Davis, DEQ