



# Oregon

Kate Brown, Governor

Department of Environmental Quality

Western Region Medford Office

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April 9, 2020

Kristana Becherer  
Roseburg Forest Products Co.  
P.O. Box 1088  
Roseburg, OR 97470  
Certified Mail

RE: Regional Haze Four Factor Analysis  
Roseburg Forest Products Co. Riddle Plywood  
**10-0078-TV-01**

Dear Kristana,

DEQ has reviewed your letter dated February 19, 2020, regarding the Regional Haze Four Factor Analysis for Roseburg's Riddle Plywood facility and DEQ concurs that a Four Factor Analysis is not required for this facility. As noted in your letter, the permit renewal in July 2019 resulted in lower Plant Site Emission Limits (PSELs) and the facility's current Q/d is less than 5.

**Plant Site Emission Limits (tons/year)**

NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>	Total (Q)	d (km)	Q/d
144	39	108	291	68.9	4.2

The Title V permit sets federally enforceable emission limits. In addition, the 2019 permit renewal reduced the unassigned emissions, so any increases in emissions above the netting basis by more than the Significant Emission Rates (SERs) would trigger state New Source Review (NSR) or Prevention of Significant Deterioration (PSD) permitting and analyses. Thank you for your commitment to protecting Oregon's communities and environment.

If you have any questions about the content of this letter or need technical assistance, please feel free to contact me at 541-776-6199.

Sincerely,

Janice Tacconi, P.E.  
Title V Permit Writer

Cc: D Pei Wu, DEQ  
Michael Orman, DEQ  
Ali Mirzakhali, DEQ