

BILLINGS Kenzie * DEQ

From: BILLINGS Kenzie
Sent: Thursday, January 14, 2021 6:17 PM
To: Ellen Porter
Cc: JOHNSON Keith; GISKA JR; 'TACCONI Janice'; PETERSON Byron
Subject: Roseburg Forest Products: follow-up to yesterday's call
Attachments: Td-Updated RFP Medford MDF AQ405cao - 2019-27-19_DEQcorrection.xlsx; 150073_RFP_CAO updates.pdf

Ellen,

Thank you for the discussion yesterday – please find a summary and proposed next steps below:

DEQ completed our review of the Level 3 Risk Assessment dated December 12, 2020 that was submitted on behalf of Roseburg Forest Products Medford (RFP). When reviewing the Emissions Inventory approved on January 8, 2020 to verify emission rates used for the Risk Assessment as proposed in the revised Risk Assessment Work Plan dated July 8, 2020, we discovered that PAH emissions for the sander dust-fired boiler were not incorporated into the approved Emissions Inventory.

DEQ realizes this was an oversight and requires PAHs to be estimated from the sander dust-fired boiler. Because RFP is an NCASI member and provided NCASI emission factors for all TACs, other than dioxins and furans, in the approved Emissions Inventory, DEQ requests that NCASI emission factors for PAHs from biomass boilers be used to estimate PAH emissions from the sander dust-fired boiler at this facility. DEQ considers these PAH emission factors to be the best available data for this TEU, but is open to reviewing alternative emissions data specific to sander dust-fired boiler PAH emissions.

While these changes appear to be unlikely to substantively alter the results of the draft Risk Assessment, DEQ believes it is important for the final approved assessment to include all the relevant emissions data.

Attached please find the Emissions Inventory that DEQ has revised to include the following (note that changes are highlighted in orange):

1. Hexavalent chromium emissions from natural gas combustion
2. PAH emissions from the sander dust-fired boiler

The next step is to submit a revised Emissions Inventory and revise the Modeling Protocol, Risk Assessment Work Plan, and Level 3 Risk Assessment (see attached PDF).

Please let me know if you have any questions.

Best,

Kenzie Billings, P.E.
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Pronouns: she, her, hers

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