



# Oregon

Kate Brown, Governor

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March 25, 2021

Roseburg Forest Products Co.  
2685 N Pacific Hwy  
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Ms. Porter,

The Department of Environmental Quality (DEQ) has completed our review of the revised Modeling Protocol (MP), Level 3 Risk Assessment Work Plan (RAWP), and Level 3 Risk Assessment (RA) dated March 8, 2021 and submitted by the Roseburg Forest Products facility (Roseburg) in Medford, OR as part of the Cleaner Air Oregon (CAO) program. DEQ provided Roseburg a revised Emissions Inventory and requested revisions to the CAO MP, RAWP, and RA on January 14, 2021.

In accordance with OAR 340-245-0050 and OAR 340-245-0210, this letter provides written notice to you that DEQ has reviewed and approves the revised CAO MP, RAWP, and RA submitted in March 2021, with the following comments:

1. Section 2.2 of the RAWP summarizes a proposed approach to evaluate whether or not to aggregate toxic emissions units (TEUs) after determining whether the facility exceeds the source permit level as outlined in OAR 340-245-0050(7). This source's risk does not exceed the source permit level and meets the definition of a *de minimis* source; for future reference, proposals to aggregate TEUs must be included in the MP and RAWP as required in OAR 340-245-0060(2).
2. The presentation of population risk at the end of Section 6.1 of the RA is acceptable as a way of providing context for low probability events. However, as noted in DEQ's *Recommended Procedures for Toxic Air Contaminant Health Risk Assessments*: "To be clear, in the Cleaner Air Oregon program DEQ looks at individual probabilities resulting from exposure to toxic air contaminants at specific exposure locations, and not a total population cancer burden." Because the primary comparison of cancer risk is to individual probabilities, the first part of Section 6.1 could have stated the maximum excess cancer risks in terms of chances in one million, rather than referring to populations of one million people.

The next step in the CAO process is to complete and submit the AQ501 Cleaner Air Oregon Permit Application form and the \$8,800 *Level 3 risk assessment – de minimis/no permit required* activity fee. The completed AQ501 and applicable fee are due no later than April 24, 2021.

Please contact me directly at (503.229.5247, [billings.kenzie@deq.state.or.us](mailto:billings.kenzie@deq.state.or.us)) with any questions.

Sincerely,

Kenzie Billings  
DEQ CAO Project Manager

15-0073 Roseburg Forest Products Co.

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