



# Oregon

Kate Brown, Governor

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July 31, 2019

Roseburg Forest Products Co.  
2685 N Pacific Hwy  
Medford, OR 97501-1305

Ms. Green,

DEQ appreciates the submittal of the Cleaner Air Oregon Air Toxics Emissions Inventory Form AQ405CAO for the Roseburg Forest Products facility in Medford, OR. DEQ received your submittal on May 31, 2019 and has completed an initial review.

Based upon this review, DEQ has identified a number of deficiencies in your May 31, 2019 submittal. **According to OAR 340-245-0030(2), DEQ is requesting you submit additional information, corrections and updates to the Emissions Inventory by no later than August 20, 2019.**

DEQ also requests clarification regarding the use of identical activity values for both the "requested PTE" and "capacity" activities reported in the submitted Emissions Inventory. Please clarify if Roseburg Forest Products is requesting to establish Source Risk Limits at the "capacity" activity levels as reported in this submittal, or revise these values if they do not represent "requested PTE" activity levels in accordance with OAR 340-245-0040(3)(a)(B)(ii)(II).

## Specific Comments

1. All emissions units that emit Toxic Air Contaminants must be included in this inventory. Please revise the submittal to include the "Storage Pile and Material Handling Equipment" emissions unit cited in the facility's permit as DEQ anticipates potential Toxic Air Contaminant emissions from this unit.
2. In order for DEQ to approve the submitted inventory, please provide emission factor references or methodologies used to calculate emissions. If these are not publicly available, furnish DEQ with the reference for approval – e.g., NCASI database references.
3. In regards to substantiation of the omission of PAHs and dioxins/furans from the "Wood Fuel Boiler" emissions, DEQ does not consider the referenced memorandum from NCASI to be applicable for this emissions unit. Please revise the inventory to include emission factors for PAHs and dioxins/furans from wood fired boilers.
4. Provide the supporting source test data for all source tests referenced in the submitted inventory:
  - a. Furnish Dryers: September 2006, October 2008, January 2009, March 2009, August 2012
  - b. Press: September 2006
  - c. Press Fugitives: December 2006

Please note the following if you think some or all of this information should be treated as "Confidential Business Information":

In order for the DEQ to exempt Emissions Inventory submittal data not already publicly available, the DEQ must obtain the requested emissions information along with verification of this claim pursuant to OAR 340-214-0130, specifically sub-sections 2(b) and 3(a-e):

(2) If an owner or operator claims that any writing, as that term is defined in ORS 192.410, is confidential or otherwise exempt from disclosure, in whole or in part, the owner or operator must comply with the following procedures:

- (a) The writing must be clearly marked with a request for exemption from disclosure. For a multi-page writing, each page must be so marked.
- (b) The owner or operator must state the specific statutory provision under which it claims exemption from disclosure and explain why the writing meets the requirements of that provision.
- (c) For writings that contain both exempt and non-exempt material, the proposed exempt material must be clearly distinguishable from the non-exempt material. If possible, the exempt material should be arranged so that it is placed on separate pages from the non-exempt material.

(3) For a writing to be considered exempt from disclosure as a "trade secret," it must meet all of the following criteria:

- (a) The information cannot be patented;
- (b) It must be known only to a limited number of individuals within a commercial concern who have made efforts to maintain the secrecy of the information;
- (c) It must be information that derives actual or potential economic value from not being disclosed to other persons; and
- (d) It must give its users the chance to obtain a business advantage over competitors not having the information.
- (e) It must not be emissions data.

Please communicate any questions or clarifications regarding the above comments proactively in order to provide a timely, revised submittal by August 20, 2019. DEQ remains available during this timeframe to discuss the submittal with you and answer any questions you may have. Failure to provide additional information or corrections requested by DEQ may result in a violation of OAR 340-245-0030(1) and OAR 340-245-0040(1).

Once DEQ receives a revised submittal with the requested information, we will complete our review of the Emissions Inventory. Please contact me directly at (503.229.5248, [billings.kenzie@deq.state.or.us](mailto:billings.kenzie@deq.state.or.us)), and we look forward to your continued assistance with this process.

Sincerely,



Kenzie Billings  
DEQ CAO Project Manager

Cc: Keith Johnson, DEQ  
J.R. Giska, DEQ  
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