



Oregon

Kate Brown, Governor

Department of Environmental Quality
Agency Headquarters
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October 4, 2019

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

Ms. Porter,

DEQ has completed review of additional emissions inventory information submitted by the Roseburg Forest Products facility (Roseburg) in Medford, OR on August 20, 2019. The submittal was prepared to address missing or incomplete information from Roseburg's initial submitted emissions inventory and to provide additional information on other items.

Based on DEQ's review of the revised submittal and pursuant to OAR 340-245-0030(4)(b), please provide the information requested below by October 24, 2019.

Specific Comments

1. DEQ acknowledges and approves Roseburg's proposal to treat the "requested PTE" and "capacity" activity levels as equivalent for purposes of the risk assessment process for the Medford facility.
2. Based on DEQ's review of NCASI Technical Bulletin No. 723, DEQ agrees with Roseburg's conclusion that most or all VOC emissions from Storage Pile and Miscellaneous Fugitive Sources listed in the facility permit are likely terpenes, which are not reportable under OAR 340-245-8020 Table 2.
3. Regarding our request for NCASI emission factor references in your emissions inventory submittal, in order to approve the emissions factors referencing the "2018 NCASI database", DEQ requires that Roseburg furnish the supporting technical information for review listed in the attached table for those factors that do not match the values in NCASI Technical Bulletin No. 1013.
4. DEQ does not agree with Roseburg's assertion that the wood-fueled boiler does not emit dioxins/furans. Pursuant to OAR 340-245-0030(4)(a), DEQ will establish appropriate emission rates and provide Roseburg with these values upon final approval of the facility's emissions inventory.
5. In our previous letter, we mistakenly requested source testing data from September 2006. Thank you for submitting the applicable RCO source testing data. Please verify that Roseburg's current operating parameters are represented by the submitted source test results.

Pursuant to OAR 340-245-0030(4)(b), please provide the requested information by October 24, 2019. Please contact me directly at (503) 229.5247, billings.kenzie@deq.state.or.us with any questions. We look forward to your continued assistance with this process.

15-0073 Roseburg Forest Products Co.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kenzie Billings".

Kenzie Billings
DEQ CAO Project Manager

Cc: Byron Peterson, DEQ
Claudia Davis, DEQ
Keith Johnson, DEQ
J.R. Giska, DEQ
File

Attachment: Table of Requested NCASI Emission Factor References

Emission Factor Reference	CAS	Chemical Name	NCASI Technical Bulletin 1013	Emission Factor in NCASI 2018 Air Toxics Database
NCASI 2018 Air Toxics Database, emission factor for Boilers – Wood	56-23-5	Carbon tetrachloride	2.01*10 ⁻⁵ lb/MMBtu ¹	9.87*10 ⁻⁶ lb/MMBtu
NCASI 2018 Air Toxics Database, emission factor for Boilers – Wood	74-87-3	Chloromethane (Methyl chloride)	3.78*10 ⁻⁵ lb/MMBtu ¹	4.35*10 ⁻⁵ lb/MMBtu
NCASI 2018 Air Toxics Database, emission factor for Boilers – Wood	98-82-8	Isopropylbenzene (Cumene)	No emission factor proposed ²	1.77*10 ⁻⁵ lb/MMBtu
NCASI 2018 Air Toxics Database, emission factor for Boilers – Wood	84-66-2	Diethylphthalate	2.18*10 ⁻⁵ lb/MMBtu ¹	4.36*10 ⁻⁵ lb/MMBtu
NCASI 2018 Air Toxics Database, emission factor for Boilers – Wood	100-41-4	Ethylbenzene	3.95*10 ⁻⁴ lb/MMBtu ¹	1.22*10 ⁻⁵ lb/MMBtu
NCASI 2018 Air Toxics Database, emission factor for Boilers - Wood - Dry Control Devices	7664-93-9	Hydrogen fluoride	2.35*10 ⁻⁴ lb/MMBtu ¹	9.05*10 ⁻⁵ lb/MMBtu
NCASI 2018 Air Toxics Database, emission factor for Boilers – Wood	78-93-3	2-Butanone (Methyl ethyl ketone)	1.56*10 ⁻⁵ lb/MMBtu ¹	6.97*10 ⁻⁶ lb/MMBtu
NCASI 2018 Air Toxics Database, emission factor for Boilers – Wood	75-09-2	Dichloromethane (Methylene chloride)	5.47*10 ⁻⁴ lb/MMBtu ¹	3.98*10 ⁻⁴ lb/MMBtu
NCASI 2018 Air Toxics Database, emission factor for Boilers – Wood	123-38-6	Propionaldehyde	2.52*10 ⁻⁴ lb/MMBtu ¹	3.11*10 ⁻⁴ lb/MMBtu
NCASI 2018 Air Toxics Database, emission factor for Boilers – Wood	100-42-5	Styrene	4.77*10 ⁻⁴ lb/MMBtu ¹	4.69*10 ⁻⁴ lb/MMBtu
NCASI 2018 Air Toxics Database, emission factor for Boilers – Wood	108-88-3	Toluene	2.11*10 ⁻⁵ lb/MMBtu ¹	1.14*10 ⁻⁵ lb/MMBtu
NCASI 2018 Air Toxics Database, emission factor for Boilers – Wood	1330-20-7	Xylene (mixture), including m-xylene, o-xylene, p-xylene	1.84*10 ⁻⁵ lb/MMBtu ¹	5.22*10 ⁻⁶ lb/MMBtu
NCASI 2018 Air Toxics Database, emission factor for Boilers - Wood w/ESP or Fabric Filter	7440-36-0	Antimony and compounds	3.02*10 ⁻⁷ lb/MMBtu ³	3.06*10 ⁻⁶ lb/MMBtu
NCASI 2018 Air Toxics Database, emission factor for Boilers - Wood w/ESP or Fabric Filter	7440-41-7	Beryllium and compounds	3.01*10 ⁻⁸ lb/MMBtu ³	2.85*10 ⁻⁸ lb/MMBtu

Emission Factor Reference	CAS	Chemical Name	NCASI Technical Bulletin 1013	Emission Factor in NCASI 2018 Air Toxics Database
NCASI 2018 Air Toxics Database, emission factor for Boilers - Wood w/ESP or Fabric Filter	7440-43-9	Cadmium and compounds	3.66×10^{-7} lb/MMBtu ³	3.24×10^{-7} lb/MMBtu
NCASI 2018 Air Toxics Database, emission factor for Boilers - Wood w/ESP or Fabric Filter	7440-48-4	Cobalt and compounds	2.35×10^{-6} lb/MMBtu ³	4.97×10^{-7} lb/MMBtu
NCASI 2018 Air Toxics Database, emission factor for Boilers - Wood w/ESP or Fabric Filter	7440-50-8	Copper and compounds	4.99×10^{-6} lb/MMBtu ³	3.79×10^{-6} lb/MMBtu
NCASI 2018 Air Toxics Database, emission factor for Boilers - Wood w/ESP or Fabric Filter	7439-96-5	Manganese and compounds	9.13×10^{-5} lb/MMBtu ³	9.57×10^{-5} lb/MMBtu

Notes

1. Mean Emission Factor in Table 4.1 of NCASI Technical Bulletin 1013.
2. Table 4.1 of NCASI Technical Bulletin 1013. Because only one source test was included in the determination of an average emission factor, this emission factor was discarded.
3. Mean Emission Factor in Table 4.3 of NCASI Technical Bulletin 1013.