



LMI Environmental, LLC

February 24, 2020

Kenzie Billings
Oregon Department of Environmental Quality
700 NE Multnomah St., Suite 600
Portland, OR 97232

RE: Risk Assessment Work Plan Extension Request to Accommodate EQC Decision

Dear Ms. Billings,

Thank you for your phone call on Feb 21, 2020. As we discussed, the Roseburg Forest Products Medford facility (Roseburg) is the first existing source that has reached the point in the process to be submitting a Risk Assessment Work Plan (RAWP). As such, Roseburg finds itself in the unusual position of trying to prepare the RAWP prior to the completion of the proposed Hazard Index rule-making. Specifically, the EQC is preparing to make a decision on the Department's proposed Hazard Index rulemaking, in which they will determine whether to reduce the Risk Action Levels for a majority of pollutants from the current value of 5 to a new value of 3. Additional higher Risk Action Levels would also be affected.

As you know, the Roseburg Medford facility's emission inventory contains some of those pollutants for which a lower Hazard Index is proposed. Submitting a RAWP now could result in providing a Hazard Index calculation methodology that will no longer be current once the EQC makes its decision. For that purpose, Roseburg is requesting an extension to submit its RAWP to a date 10 working days after the EQC reaches its decision.

Roseburg appreciates your assistance and cooperation with this matter. If you have any questions or concerns, feel free to contact Ellen Porter at (541) 643-1748.

Thank you,

Ellen Porter

c: Chantal Green, Roseburg Forest Products
Tom Wood, Stoel Rives
Chad Darby, Maul Foster Alongi