



# Oregon

Kate Brown, Governor

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July 2, 2020

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

Ms. Porter,

DEQ appreciates timely submittal of the Cleaner Air Oregon (CAO) Risk Assessment Work Plan (Work Plan) for the Roseburg Forest Products Co. (Roseburg) facility in Medford, OR. DEQ received your submittal on June 10, 2020 and has completed an initial review.

Based upon this review, DEQ has identified items to clarify in your June 10, 2020 submittal. **According to OAR 340-245-0030(2), DEQ is requesting you submit a revised Work Plan by no later than July 31, 2020.**

## Specific Comments

1. Please consider the portion of total chromium emitted as hexavalent chromium during natural gas combustion, and revise the Work Plan to include this consideration.

## Minor Comments

2. Section 5 of the Work Plan states that the proposed calculation approach will result in an overestimation of risk for 24-hour acute exposures. This is because individual TEUs are assigned unit emission rates, which causes maximum concentrations for different TEUs to occur at different receptors at different times. DEQ agrees that this approach will overestimate risk. Other approaches are available, such as using a risk equivalent emission rate (REER) where the model results are in terms of risk that is additive within each exposure scenario. As a result, the highest risk receptor for all TEUs summed together is readily identified for each exposure scenario.

## Confidential or trade secret information submitted to DEQ

DEQ is requesting that you submit additional information to complete your Work Plan. If you think that any of that information is confidential, trade secret or otherwise exempt from disclosure, in whole or in part, you must comply with the requirements in OAR 340-214-0130 to identify this information. This includes clearly marking each page of the writing with a request for exemption from disclosure and stating the specific statutory provision under which you claim exemption. Emissions data is not exempt from disclosure.

Please communicate any questions or clarifications regarding the above comments proactively in order to provide a timely, revised submittal by July 31, 2020. 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 Work Plan. Please contact me directly at (503.229.5247, [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: Byron Peterson, DEQ  
Janice Tacconi, DEQ  
Claudia Davis, DEQ  
Keith Johnson, DEQ  
J.R. Giska, DEQ  
File