

Public Notice: Request for Comments

Proposed Revised Construction Air Contaminant Discharge Permit for Roseburg Forest Products, Dillard Plant



State of Oregon
Department of
Environmental
Quality

Western Region –
Salem Air Quality
Program

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Notice issued: January 31, 2007

Written comments due: 5 p.m., March 7, 2007

Where can I send comments and get more information?

DEQ accepts comments by mail, fax and e-mail.

Name: Patty Hamman

Phone: (503) 378-5305 or toll free in Oregon (800) 349-7677

Mailing address: 750 Front Street NE, Suite 120, Salem, OR 97301-1039

Fax: (503) 378-4196

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Where can I get technical information?

Name: Gary Andes

Phone: (503) 378-5316 or 1-800-349-7677.

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E-mail: andes.gary@deq.state.or.us

How can I review documents?

A copy of the proposed permit and review report is available for review at the Douglas County Library, 1409 NE Diamond Lake Blvd., Roseburg, Oregon. The full content of the application is available for public inspection at the Western Region-Salem Office, 750 Front St. NE, Suite 120, Salem, OR. File viewing hours are from 8:30 a.m. – noon and from 1:00 p.m. – 4:00 p.m. Monday through Friday, except on holidays.

What are DEQ's responsibilities?

The Oregon Department of Environmental Quality (DEQ) is the regulatory agency that helps protect and preserve Oregon's environment. DEQ is responsible for protecting and enhancing Oregon's water and air quality, for cleaning up spills and releases of hazardous materials, and for managing the proper disposal of hazardous and solid wastes. One way DEQ does this is by requiring permits for certain activities

The purpose of this notice is to invite you to submit written comments on this draft permit.

Who is the applicant?

Roseburg Forest Products Co.
Dillard Plant
PO Box 1088
Roseburg, OR 97470

Construction Permit No. 10-0057

Where is the facility located?

Old Highway 99 South
Dillard, OR 97432

What is proposed?

The Department is proposing to issue a revised Construction Air Contaminant Discharge Permit to Roseburg Forest Products that will allow the company to reconfigure the particleboard furnish drying systems at the facility and install a new green dryer with a low NO_x sanderdust/natural gas burner. This change will allow for the use of all of the sanderdust produced at the facility as a fuel in the green dryer. Existing enhanced wet electrostatic precipitators will be used to control PM emissions from the new green dryer and the remaining three existing final dryers. An RTO will be used to further control VOC, HAP, and CO emissions from the green dryer.

Roseburg Forest Products has requested that an enhanced review process be implemented for the issuance of this construction permit. This entails complying with the external review procedures in OAR 340-218-0210 and 0230 so that the

operating requirements contained in the approved Construction ACDP may later be incorporated into the facility's Oregon Title V Operating Permit (No. 10-0025) by administrative amendment.

What are the changes in anticipated operating emissions?

As shown in the following table, the proposed construction will result in both increases and decreases in the facility's emission limits.

Although the combustion of sanderdust in the green dryer burner will result in an increase in CO and NO_x emissions from the green dryer, these increases will be offset by not burning the sanderdust in the boilers, the low NO_x burner, and the RTO. PM emission reductions will occur due to the reconfiguration of the particleboard furnish drying systems and the use of ESPs on the green dryer.

Pollutant	Current Permitted Emissions (tons/year)	Proposed Permitted Emissions (tons/year)	Emission Change (tons/yr)
PM	1313	1219	-94
PM ₁₀	909	872	-37
SO ₂	103	116	+13
NO _x	1593	1469	-124
CO	1939	1965	+26
VOC	1861	1590	-271
Pb	NA	0.5	+0.5

Who is affected?

Property owners and residents in the vicinity of the facility.

Permit expiration:

October 1, 2011.

Note: Construction must begin within 18 months of the permit issuance date.

What other DEQ permits are required?

Other permits issued or required by Department for this source include three NPDES General Permits for stormwater, log pond, and cooling water discharges.

What legal requirements apply?

Oregon Administrative Rules in Division 216 require that the facility obtain a Construction ACDP from the Department before installing or modifying equipment. The source must obtain a modification to its existing Oregon Title V Operating Permit (No. 10-0025) prior to operating the new or modified equipment.

What happens next?

DEQ will review and consider all comments received during the comment period. The permit will then be forwarded to EPA for their review. Upon EPA approval, the permit will be issued as drafted or modified based on the comments received.

DEQ will hold a hearing if requested by 10 or more individuals or one person representing a group of 10 or more individuals.

Accessibility information

DEQ is committed to accommodating people with disabilities at our hearings. Please notify DEQ of any special physical or language accommodations or if you need information in large print, Braille or another format. To make these arrangements, contact DEQ Public Affairs at (541) 686-7838, extension 235 or toll free in Oregon at (800) 349-7677.

People with hearing impairments may call DEQ's TTY number, (503) 378-3684.

What are the known health effects or environmental impacts of the permitted substances stored, disposed of, discharged or emitted by the facility?

CO-Carbon Monoxide. CO is an invisible gas, usually formed as a product of combustion in such things as boilers and automobiles. CO is considered a pollutant because it can be poisonous to animals and humans.

NO_x-Nitrogen Oxides. NO_x is a brown-colored, toxic gas, formed when ordinary air passes through a hot flame such as in an automobile engine or gas boiler. NO_x is considered a pollutant because it decreases visibility and because it contributes to the formation of ozone and acid rain.

PM₁₀-Fine Particulate Matter. PM₁₀ consists of very fine airborne dust particles (less than 10 microns across) formed by fuel burning (as smoke) or by sanding and grinding. PM₁₀ is considered a pollutant because it decreases visibility, and because it can have adverse human health effects.

SO₂-Sulfur Dioxide. SO₂ is an invisible gas with a pungent odor, formed by burning fossil fuel which contains sulfur. SO₂ is considered a pollutant because it can form particles that decrease visibility, and because large amounts of it can cause acid rain.

VOC-Volatile Organic Compounds. VOC consist of organic chemicals which are found in products such as gasoline, coatings, resins, or paint thinners which, when vaporized, combine with NO_x in the presence of sunlight to form ozone.

How are the permitted substances measured?

Emissions of pollutants are measured by stack tests at a number of sources at the facility. In addition, emissions from other sources are calculated using standard emission factors and production values or material balance/usage techniques. In some cases, operating parameters of emission control equipment must be monitored on a regular or continuous basis to insure good equipment performance.