

April 23, 2020

Kristana Becherer  
Manager - Environmental Permitting & Compliance  
Roseburg Forest Products  
P.O. Box 1088  
Roseburg, OR 97470

Sent Via Email: [KristanaB@rfpco.com](mailto:KristanaB@rfpco.com)

RE: Request to Postpone Sander Dust Boiler Source Testing

Dear Ms. Becherer:

On April 13, 2020, the Montana Department of Environmental Quality (DEQ) received a request from Roseburg Forest Products (Roseburg) to postpone source testing at the Sander Dust Boiler until September of 2020. Roseburg submitted a Source Test Protocol to DEQ on March 6, 2020 that described planned testing at the Sander Dust Boiler. Roseburg planned to test the Sander Dust Boiler during the week of April 19, 2020 for particulate matter (PM), PM with an aerodynamic diameter equal to or smaller than 10 microns (PM<sub>10</sub>), nitrogen oxides (NO<sub>x</sub>) and carbon monoxide (CO) emissions, as required under Montana Air Quality Permit (MAQP) #2303-22 (Final 6/12/2018) and Montana Air Quality Operating Permit #OP2303-10 (Effective 7/19/2019).

Under the authority of the Administrative Rules of Montana (ARM) 17.8.105 and ARM 17.8.749, Section II.K of MAQP #2303-22 requires Roseburg to conduct source testing on an every 2-year basis, or another testing schedule as may be approved by DEQ, to demonstrate compliance with the conditions in Section II.B of MAQP #2303-22.

Similarly, under the authority of ARM 17.8.105 and ARM 17.8.1213, Section III.O of Operating Permit #OP2303-10 requires Roseburg to perform emissions testing for PM, PM<sub>10</sub>, NO<sub>x</sub> and CO on an every 2-year basis, or another testing schedule as may be approved by DEQ.

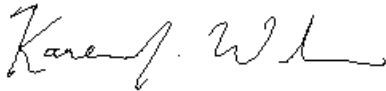
Roseburg requested to postpone the scheduled testing due to travel and social distancing directives in response to the COVID-19 pandemic in order to protect its workers and contractors, and to be consistent with state and federal guidelines. Roseburg requested approval from DEQ to postpone the source testing until September of 2020.

DEQ approves the request to postpone the Sander Dust boiler emission testing as required under MAQP #2303-22 and Operating Permit #OP2303-10 with the following conditions:

- Roseburg shall complete the delayed tests no later than December 31, 2020, or another date as approved by DEQ.
- DEQ expects future source testing of the Sander Dust Boiler to be conducted within the previously anticipated schedule, or to be completed by May 24, 2022.
- Roseburg shall comply with all other applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in MAQP #2303-22 and Operating Permit #OP2303-10.
- All source tests must be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (MSTPPM) (ARM 17.8.106).
- Section 2 of the MSTPPM states that confirmation of the test date is required a minimum of three working days prior to the source test. DEQ understands that a test date may need to change for various reasons, but notification of any change must be submitted to DEQ prior to the test. Notification may be submitted by email or telephone. Failure to provide an actual source test date notification may result in DEQ's rejection of the source test results.

Should you have any questions regarding the information contained in this letter, please contact me at (406) 258-4907, or by email at [kawilson@mt.gov](mailto:kawilson@mt.gov).

Sincerely,



Karen J. Wilson, MS  
Senior Environmental Science Specialist

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cc: John Myers, Director of Environmental Health and Safety, Roseburg, [johnmy@rfpco.com](mailto:johnmy@rfpco.com)  
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