Sierra Pine Assignment Terminated; BUD still valid and transferred to Roseburg Forest Products.

David Lynch
SierraPine Ltd., Medford Division
P.O. Box 4049
Medford, OR 97501

RE: Beneficial Use Determination 20101012 SierraPine Ltd., for Scrubber Mud - Jackson County

October 17, 2011

Dear Mr. Lynch:

The Department of Environmental Quality has reviewed SierraPine Ltd.'s October 12, 2010 application for a solid waste beneficial use determination. The application proposes to reuse SierraPine wet scrubber mud material as a saw dust and wood chip substrate for use as: 1) agricultural and nursery soil amendment/mulch, 2) livestock bedding and 3) as feedstock for composting facilities.

DBQ has determined that SierraPine's proposal to beneficially use wet scrubber mud as: 1) agricultural and nursery soil amendment/mulch and 2) livestock bedding meets the requirements for a case-specific Beneficial Use Determination under Oregon Administrative Rules 340-093-0260 through -0290. The BUD is limited to the material, approved uses, and conditions specified in the table below. The conditions of the BUD are intended to prevent adverse affects to human health and the environment.

<table>
<thead>
<tr>
<th>Solid Waste</th>
<th>Beneficial Use</th>
<th>Conditions on Use</th>
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<tbody>
<tr>
<td>Scrubber Mud</td>
<td>Livestock bedding, agricultural and nursery mulch/soil amendment</td>
<td>- Users must be provided with a written description of the composition of the wet scrubber mud and a chemical analysis; - Users must be provided with written guidance on appropriate management of scrubber mud including methods on how to prevent nuisance dust and specific appropriate agricultural use as mulch or soil amendment; - SierraPine must track the amounts and disposition of wet scrubber mud including name, address, and phone number of users. The list must be kept for 10 years and made available to DBQ upon request.</td>
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DBQ's determination is based on a review of whether SierraPine's proposed beneficial uses of wet scrubber mud meet the case-specific beneficial use performance criteria outlined in OAR 340-093-0290. Details of our review are provided in the attached case-specific evaluation report.

Regarding the use of wet scrubber mud as feedstock for composting facilities, DBQ has determined a Beneficial Use Determination is not necessary as the scrubber mud meets the Type 1 compost feedstock definition. The scrubber mud can be utilized as a feedstock at DBQ permitted composting sites.

If you have any questions about this BUD, please contact Bob Bairrows at 541-687-7354 or Bill Mason at 541-687-7427.

Sincerely,

Brian Fuller, Manager,
Western Region Hazardous and Solid Waste Program