

ORCAA Responses

Weyerhaeuser NR Company Raymond Lumbermill (Weyerhaeuser), 23NOC1614

ORCAA received feedback from two commenters. ORCAA responded to each comment received. There were no comments recorded during the May 1, 2024 public hearing held at ORCAA's Olympia office and telecast online.

Summary

There was one subject brought up by commenters, and that was with respect to a minor alteration to the Arsenic monitoring condition. Weyerhaeuser, Ecology, and ORCAA came to a consensus, which is incorporated into the Final Determination and Order of Approval.

Written Comments from the Public Comment Period

Comment #1: Matt Goldman, Trinity Consultants (Weyerhaeuser's consultant) (written comment, 4/10/2024)

Hi Aaron,

I found the following necessary edits within the permit:

Table 6.1: PM10 hourly rate should be 19.1 lb/hr.

Table 6.1: NOx project emission rate should be 44.4 tpy and facility-wide should be 44.8 tpy.

Table 6.1: CO2e project emission rate should be 45,893 tpy.

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These were typos. ORCAA agrees with the comments and made the recommended edits.

Comments #2 – 5. These comments are all part of an email chain related to the arsenic monitoring condition. ORCAA is providing one response to all 4 comments below.

Comment #2: Matt Goldman, Trinity Consultants (Weyerhaeuser's consultant) (written comment, 4/26/2024)

Please see suggested edits in orange font for the arsenic testing condition. The additional clause provides flexibility to showcase compliance should fuel contain arsenic content higher than what is expected to be emitted. Based on the research provided in the 2/14/2024 historical memorandum, it is expected that not all arsenic will be volatilized or oxidized from the fuel.

10. Arsenic Testing. The permittee must determine the heat content (Btu/lb), moisture, and percent by weight of Arsenic & inorganic arsenic compounds, NOS through sampling and analysis of a composite sample of the biomass fuel. Unless prior approval is granted by ORCAA, Arsenic & inorganic arsenic compounds, NOS content must be determined using a method from Table 6 to Subpart DDDDD of Part 63. The method used must have a minimum detection limit for arsenic sufficient to verify compliance with the limit in Condition 9. Fuel tested arsenic is not

equivalent to expected air emissions for the facility. For detected arsenic in raw fuel greater than permitted emission factor, Weyerhaeuser will provide supporting documentation to determine compliance with potential emissions. The testing must be conducted:

- i) Monthly for the first twenty-four (24) months of CDK operation,*
- ii) in conjunction with any stack testing required under Condition 18, and*
- iii) as requested by ORCAA.*

[Regulatory Basis: ORCAA Rule 6.1.4(a)(5); WAC 173-460-040(3)(b)]

Weyerhaeuser and Trinity believe the above condition provides adequate flexibility while allowing a range of options to showcase potential compliance.

Comment #3: Beth Ryder, Trinity Consultants (Weyerhaeuser’s consultant) (written comment, 4/29/2024)

Gary, thanks for speaking with me today. I heard that Ecology is uncomfortable with the lack of specificity in the updated condition (see previous email below). The goal of the update is to provide an avenue to showcase compliance if fuel arsenic is greater than the permitted emission factor. Please review the update to the condition in red. Let me know if you have any additional edits or questions.

Aaron, I’d be interested incorporating this into the issued permit, as long as it does not slow down the issuance timeline.

*Best,
Beth*

*10. Arsenic Testing. The permittee must determine the heat content (Btu/lb), moisture, and percent by weight of Arsenic & inorganic arsenic compounds, NOS through sampling and analysis of a composite sample of the biomass fuel. Unless prior approval is granted by ORCAA, Arsenic & inorganic arsenic compounds, NOS content must be determined using a method from Table 6 to Subpart DDDDD of Part 63. The method used must have a minimum detection limit for arsenic sufficient to verify compliance with the limit in Condition 9. **Fuel tested arsenic is not equivalent to expected air emissions for the facility. For detected arsenic in raw fuel greater than permitted emission rate, Weyerhaeuser will provide a test plan to determine compliance with potential emissions. The test plan must be approved by ORCAA to demonstrate compliance and may include a mass balance inclusive of waste and/or retained materials, or other methods approved by ORCAA.** The testing must be conducted:*

- i) Monthly for the first twenty-four (24) months of CDK operation,*
- ii) in conjunction with any stack testing required under Condition 18, and*
- iii) as requested by ORCAA.*

[Regulatory Basis: ORCAA Rule 6.1.4(a)(5); WAC 173-460-040(3)(b)]

Comment #4: Gary Palcisko, Washington State Department of Ecology (written comment, 4/30/2024)

Hi Beth,

Thank you for sending updated language regarding the arsenic testing condition. We think language which mentions the alternate test will suffice to alleviate our concerns. We provide a slight alternative to the language you've suggested (below in red).

10. Arsenic Testing. The permittee must determine the heat content (Btu/lb), moisture, and percent by weight of Arsenic & inorganic arsenic compounds, NOS through sampling and analysis of a composite sample of the biomass fuel. Unless prior approval is granted by ORCAA, Arsenic & inorganic arsenic compounds, NOS content must be determined using a method from Table 6 to Subpart DDDDD of Part 63. The method used must have a minimum detection limit for arsenic sufficient to verify compliance with the limit in Condition 9. The testing must be conducted:

- i) Monthly for the first twenty-four (24) months of CDK operation,*
- ii) in conjunction with any stack testing required under Condition 18, and*
- iii) as requested by ORCAA.*

For detected arsenic in raw fuel greater than permitted emission rate, Weyerhaeuser may demonstrate compliance with an alternate test. The alternate test may include a mass balance approach inclusive of waste and/or retained materials or other methods. The alternate test plan must receive prior approval from ORCAA.

Let me know if you have any questions.

Comment #5: Beth Ryder, Trinity Consultants (Weyerhaeuser's consultant) (written comment, 4/30/2024)

Thanks Gary for taking the time to review and update. This looks great.

@Aaron Manley – think we can get this in the permit?

Best,

Beth

ORCAA Responses

Trinity's original proposed changes to the arsenic monitoring condition were too vague to sufficiently demonstrate compliance with the arsenic emission limit. ORCAA ultimately used the Ecology-supplied language to Condition 10 with a few clarifications.

Written and Verbal Comments from the May 1, 2024 Public Hearing at ORCAA's main office and telecast online

There were no comments received at the May 1, 2024 Public Hearing.

- END OF RESPONSES TO COMMENTS -