ORDER OF APPROVAL

NOTICE OF CONSTRUCTION 24NOC1636

ISSUED to Weyerhaeuser NR Company - Rochester Seed Plant on

APR 10 2024

This Order of Approval ("Order") is issued in accordance with Olympic Region Clean Air Agency ("ORCAA") Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6.

Conditional approval to install a replacement baghouse located at 7935 US 12, in Rochester ("Approved Location"), for operation solely as described in the associated Notice of Construction ("NOC") application 24NOC1636, is hereby GRANTED to Weyerhaeuser NR Company - Rochester Seed Plant ("Applicant"), subject to the Conditions of Approval listed below.

This Order and the Conditions of Approval herein remain in effect for the life of the Approved Equipment as used at the Approved Location and shall be binding on Applicant, current owners and operators of the equipment, and Applicant's heirs, successors and assigns unless amended or superseded by a subsequent Order issued by ORCAA or unless the equipment is permanently shut down. The Applicant must notify any subsequent owner, operator, heirs, successor or assigns of this Order and the Conditions of Approval herein.

Conditions of Approval established in this Order shall be enforceable in addition to any applicable state, local and federal regulations, or standards in existence now or in the future. Compliance with the conditions of this Order do not relieve the Applicant or any owner or operator from compliance with ORCAA Regulations, chapter 70A.15 of the Revised Code of Washington, or any other emissions control requirements, nor from any penalties for failure to comply with the same. Applicant may appeal this Order to the Pollution Control Hearings Board ("PCHB") by filing a written appeal with the PCHB and serving a copy upon ORCAA within thirty (30) days of receipt of this Order.

This Order is GRANTED, subject to the following Conditions of Approval:

1. **Approved Equipment.** The cone processing plant exhaust system as described in Notice of Construction application No. 24NOC1636 and the associated Final Determination is approved for construction and operation subject to conditions in this Order of Approval.
   [Regulatory Basis: ORCAA 6.1(a); ORCAA 6.1.2(l); 40 CFR part 52.2470(c), Table 6]

2. **Preapproval Required.** Prior approval by ORCAA may be required for the following as specified in ORCAA Rule 6.1:
   a. Construction, installation, or establishment of any stationary source;
   b. Modification to any existing stationary source;

c. Replacement or substantial alteration of emission control technology installed on an existing stationary source; or,
d. Deviations from the approved plans, drawings, data, and specifications of the stationary sources listed in Table 1.

Table 1 Stationary sources located at Weyerhaeuser

Emission Unit	Specifications:
EU1- Cone processing plant exhaust system	Exhaust system with pickup points at tumbler, scalper, and screens. Exhaust controlled by baghouse **Baghouse** Manufacturer: TBD Make: TBD Pressure Drop: TBD Design Airflow: Up to 10,000 ACFM Cleaning Mechanism: Pulse Jet or equivalent Control Efficiency: 99% or better

[Regulatory Basis: ORCAA 6.1(a); ORCAA 6.1.2(l); WAC 173-400-110(2); WAC 173-400-111(10)]

3. **BACT Limits**
   a) Opacity: Visible emissions from the baghouse must not exceed 0% (zero percent) opacity during any 6-minute average period in accordance with as determined by EPA Reference Method 9 of 40 CFR Part 60, Appendix A.
   b) Filter Efficiency: The filter efficiency of the bags must have an effective rating of 99% or better. Published filter efficiency data provided by the manufacturer or laboratories is sufficient for the purposes of demonstrating compliance with this requirement.

   [Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2)]

4. **O&M Plan** The owner or operator must devise, implement, and update, when necessary, an Operations and Maintenance (O&M) plan for assuring air pollution control systems are maintained in good operating condition and repair. The plan must include but is not limited to standard procedures for the following:
   a) The immediate vicinity of the baghouse must be kept clean to minimize emissions to the ambient atmosphere. At a minimum, this can include regularly unloading the hoppers, sweeping the area, and adequate disposal of the waste.
   b) Weekly self-inspections of the baghouse must be conducted to ensure the doors/seals and surrounding ductwork are fully sealed.
   c) Weyerhauser must establish minimum and maximum pressure drops which are indicative of good operation and repair for the baghouse. Pressure drop must be monitored at least daily when the cone processing line is operational.

   [Regulatory Basis: ORCAA Rule 6.1.4(a)(2); ORCAA Rule 4.3(g); 40 CFR part 52.2470(c), Table 6]

5. **Record Keeping.** The following records must be kept and made available upon request:

a) The written O&M plan required by Condition #4.
b) Records must be kept sufficient to verify the average arrestance (filtration) ratings of each baghouse filter material type. Published filter efficiency data provided by filter vendors or laboratories may be used to demonstrate compliance with this requirement.
c) Records demonstrating weekly self-inspections of the baghouse were conducted. For the purposes of demonstrating compliance, a checklist can be made.
d) Records of daily pressure drops on days the baghouse operates.
e) Records of corrective actions taken in response to out-of-range pressure drops.

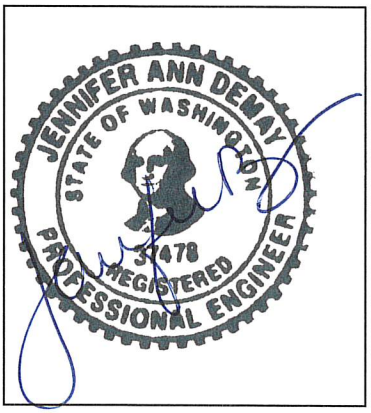
[Regulatory Basis: ORCAA 8.11; 40 CFR part 52.2470(c), Table 6]

4/10/2024

PREPARED BY: Aaron Manley, PE Date

4/10/2024

REVIEWED BY: Jennifer DeMay, PE Date



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NEW SOURCE
FINAL DETERMINATION to APPROVE:

Upgrade the exhaust system of their existing cone processing line

Weyerhaeuser NR Company - Rochester Seed Plant

24NOC1636

April 9, 2024

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NOTICE OF CONSTRUCTION
FINAL DETERMINATION TO APPROVE

Olympic Region Clean Air Agency

Issued to:	**Weyerhaeuser NR Company – Rochester Seed Plant**	**County:**	**Thurston - 67**
Location:	**7935 US 12 Rochester**	**Source:**	**160**
		RC:	**5**
Application #:	**24NOC1636**	**File:**	**344**
Prepared on:	**April 9, 2024**		

1. Summary

Weyerhaeuser NR Company - Rochester Seed Plant (Weyerhaeuser) seeks approval from Olympic Region Clean Air Agency (ORCAA) to upgrade the exhaust system of their existing cone processing line at their seed plant facility at 7935 US 12, Rochester, Washington. Modifying a stationary source of emissions triggers the requirement to obtain pre-approval through a Notice of Construction (NOC) permit. ORCAA staff reviewed Weyerhaeuser's proposal and concluded it may be conditionally approved. Recommended conditions of approval are detailed in Section 17 of this Final Determination report.

2. Regulatory Background

Pursuant to the Washington Clean Air Act under chapter 70A.15 of the Revised Code of Washington, ORCAA's Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c)[1] require New Source Review (NSR) for new stationary sources of air pollution (referred to as new sources) in ORCAA's jurisdiction. NSR is also required prior to installing, replacing, or substantially altering any air pollution control technology. NSR generally refers to the process of evaluating air quality impacts and the likelihood of compliance with applicable air regulations and standards. NSR and approval of an air permit by ORCAA is required prior to commencing construction or modification of any new source or prior to installing, replacing, or substantially altering air pollution control technology. The goal of NSR is to assure compliance with applicable air regulations and standards, including equipment performance standards and ambient air quality standards.

[1] A State Implementation Plan (SIP) is a collection of regulations and documents used by a state, territory, or local air district to implement, maintain, and enforce the National Ambient Air Quality Standards, or NAAQS, and to fulfill other requirements of the federal Clean Air Act. The Clean Air Act requires the EPA to review and approve all SIPs. ORCAA's SIP was last approved by EPA in 1995.

NSR is initiated by a project proponent submitting an air permit application referred to as Notice of Construction (NOC) application[2], which provides ORCAA information on the proposed project of sufficient detail to characterize air impacts. NOC applications are posted on ORCAA's website and may undergo a public notice and comment period if requested by the public or if emissions increases trigger an automatic public notice. Approval of a NOC in an attainment or unclassifiable area[3] is contingent on verifying a proposed project meets the following criteria from ORCAA's Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6:

1. ***Performance Standards*** **-** The new stationary source will likely comply with applicable air-performance standards such as federal new source performance standards (NSPS), national emission standards for hazardous air pollutants (NESHAPs), or any performance standards adopted under chapter 70A.15 RCW;
2. ***BACT*** **-** The new stationary source will employ "Best Available Control Technology" (BACT) to control all air pollutants emitted;
3. **RACT** – Replaced or substantially altered air pollution control technology meets the standard of "Reasonably Available Control Technology" (RACT) as defined in ORCAA Rule 1.4;
4. ***Ambient Air Quality*** **–** Emissions from the new stationary source will not cause or contribute to a violation of any ambient air quality standard;
5. ***Federal Air Permitting Requirements*** **-** The new stationary source secures all applicable federal air permits that may apply; and,
6. ***Air Toxics*** **-** If there are increases in toxic air pollutant (TAP) emissions, the requirements of Washington's Controls for New Sources of Toxic Air Pollutants under Chapter 173-460 WAC are met.

In this case, Weyerhaeuser is proposing to upgrade the exhaust system of their existing cone processing line at their seed plant facility located in Rochester, Washington. The new exhaust system will have a total flowrate of 10,000 CFM to improve overall capture of particulate emissions from screening, the scalper, and the tumbler. The changes to the exhaust system are a modification of a stationary source which requires review and approval from ORCAA through a Notice of Construction permit application.

3. Facility Background

The Weyerhaeuser Rochester Nursery has been in operation at this location for several years. This is Weyerhaeuser's first permitting action with ORCAA.

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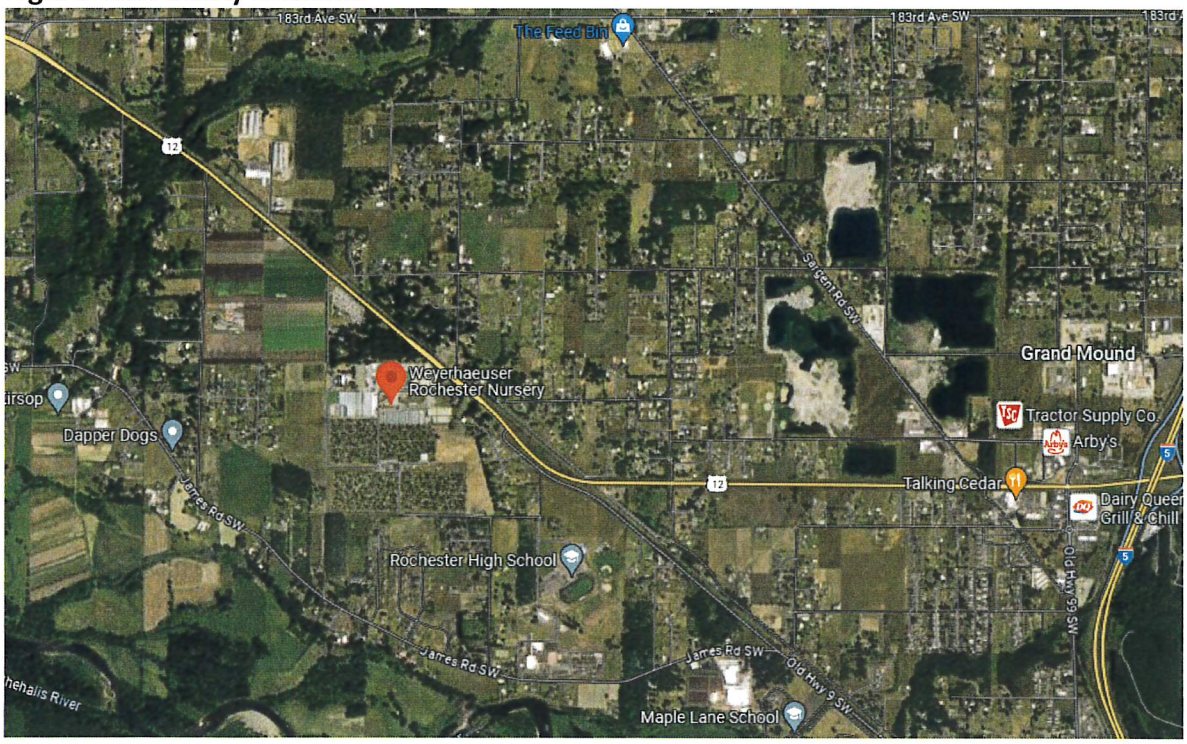
[2] There are two categories of NOC applications: Notice of Construction (NOC) and Notice of Construction Revision (NOR). NOCs are required for new or modified sources, new control technology, replacing an existing stationary source or control technology, and substantially altering control technology. NORs are required when an owner or operator requests a revision to an existing air permit issued by ORCAA.

[3] Unclassified area or "attainment area" means an area that has not otherwise been designated by EPA as nonattainment with ambient air quality standards for a particular regulated pollutant. Attainment area means any geographic area in which levels of a given criteria air pollutant (e.g., ozone, carbon monoxide, PM10, PM2.5, and nitrogen dioxide) meet the health-based National Ambient Air Quality Standards (NAAQS) for that pollutant. An area may be an attainment area for one pollutant and a nonattainment area for others.

4. Facility Description

The facility processes harvested cones for seeds and plants seeds to sprout seedlings on-site. The seedlings are later sold for planting in regional forest locations and public sale events.

Figure 4.1: Facility Location



* Imagery ©2024 Airbus, CNES/Airbus, Landsat/Copernicus, Maxar Technologies, U.S. Geological Survey, USDA/FPAC/GEO, Map data ©2024

Figure 4.2: Site Map

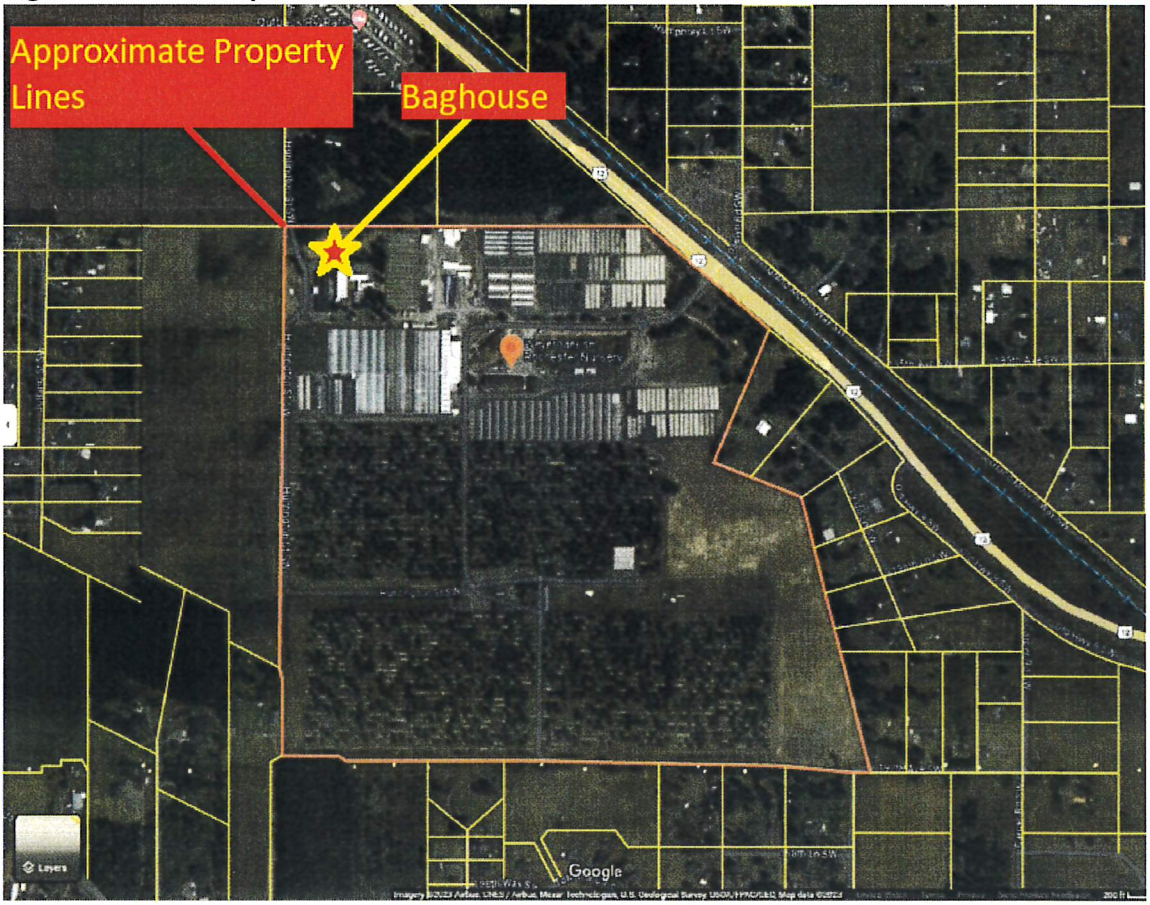


*Image provided by applicant as part of permit application
** Annotated by ORCAA

5. Project Description

Weyerhaeuser's project involves improving dust collection for the seed processing plant. Dried cones are loaded into a tumbler which shakes seeds out of the cone. Fines are generated during this process. The tumbler's dust control system will exhaust into the new baghouse. A scalper system further separates the seeds from the cone material. Dust is removed from the scalper system with several hoods. Dust from the scalper hoods will also exhaust to the new baghouse system. Weyerhaeuser is still bidding out the project, so a model has not yet been chosen. Weyerhaeuser will select a baghouse meeting the requirements of 24NOC1636's Order of Approval.

Table 5.1: New/Modified Emission Unit

Emission Unit	Description
EU1- Cone processing plant exhaust system	Exhaust system with pickup points at tumbler, scalper, and screens. Exhaust controlled by baghouse Manufacturer: TBD Make: TBD Design Airflow: Up to 10,000 ACFM

	Cleaning Mechanism: Pulse Jet or similar Control Efficiency: 99% or better

6. Emission Increases

Emissions associated with the project are fine particulate in nature. Emissions to the atmosphere result from the hoods and ducts venting the waste stream from the cone processing line outdoors as controlled by the baghouse. ORCAA staff calculated Potential to Emit (PTE) assuming the maximum production rate of the process equipment (0.318 grains/ft^3), the maximum exhaust rate of the baghouse (10,000 cfm), maximum operation of the process (8,760 hours/year) and a minimum control efficiency of 99% for the baghouse. Results are shown in Table 6.1.

Table 6.1. Emission Increases (Project Emissions)

Pollutant	Classification (Criteria[a]/HAP[b]/TAP[c])	Emission Rate (lb/hr)	Emission Rate (lb/day)	Emission Rate (lb/yr)
PM (Total Particulate)	N/A	0.273	6.54	2388
PM_{10} (Total Particulate) (<= 10 µm)	Criteria	0.273	6.54	2388
$PM_{2.5}$ (Fine Particulate (<=2.5 µm)	Criteria	0.273	6.54	2388
VOC[d] (Volatile Organic Compounds as VOC)	Criteria	0	0	0
SO_2 (Sulfur Dioxide)	Criteria	0	0	0
NO_X (Nitrogen Oxides)	Criteria	0	0	0
CO (Carbon Monoxide)	Criteria/TAP	0	0	0
Lead	Criteria/TAP	0	0	0

[a] EPA has established national ambient air quality standards (NAAQS) for six of the most common air pollutants—carbon monoxide, lead, ground-level ozone, particulate matter, nitrogen dioxide, and sulfur dioxide—known as "criteria" air pollutants (or simply "criteria pollutants").

[b] HAP means Hazardous Air Pollutant. Hazardous Air Pollutants are those known to cause cancer and other serious health impacts and are regulated under the federal Clean Air Act.

[c] TAP means any toxic air pollutant regulated in Washington and listed in WAC 173-460-150.

[d] VOC is regulated as a Criteria Air Pollutant because it is a precursor to Ground Level Ozone (O_3)

7. Administrative Requirements for NOC Applications

NOC applications are subject to filing fees according to ORCAA Rule 3.3(b) and may incur additional NOC processing fees at an hourly rate according to ORCAA Rule 3.3(c). Applicable NOC filing fees for Weyerhaeuser's NOC application were paid prior to ORCAA commencing processing of the application. Additional NOC processing fees may apply and will be determined and assessed prior to issuing a Final Determination and the Approval Order (a.k.a.: Air Permit).

NOC applications are subject to a 15-day public notice and an opportunity to request a 30-day public comment period and opportunity for a public hearing. Public notice of Weyerhaeuser's NOC application was posted on ORCAA's website on February 7, 2024. The time period for filing comments on the application and requests for a public comment period expired on February 22, 2024. No comments on the NOC application or requests for a public comment period or

hearing were received during the NOC application noticing period. Based on this result, neither a public comment period nor public hearing were initiated.

8. SEPA Review

The State Environmental Policy Act (SEPA) under Chapter 197-11 WAC is intended to provide information to agencies, applicants, and the public to encourage the development of environmentally sound proposals. The goal of SEPA is to assure that significant impacts are mitigated.

The proposed baghouse replaces a previous cyclone. As there is no material expansion or change in use beyond that previously existing, the project qualifies for a SEPA exemption under WAC 197-11-800(3).

9. Criteria for Approval

ORCAA's Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6, establish the following general criteria for approving new stationary sources and modifications to existing stationary sources of air pollution in ORCAA's region:

1. ***Performance Standards*** **-** Any new stationary source or modification will likely comply with applicable air-performance standards such as the federal new source performance standards (NSPS), national emission standards for hazardous air pollutants (NESHAPs), and any performance standards adopted under chapter 70A.15 RCW;
2. ***BACT*** **-** The new or modified stationary source is controlled to a level that meets the standard of "Best Available Control Technology" (BACT);
3. ***Ambient Air Quality*** **–** Any increase in air emissions will not cause or contribute to violation of any ambient air quality standard;
4. ***Federal Air Permitting Requirements*** **–** All applicable federal air permits, if required, are secured;
5. ***Washington Air Toxics Regulations*** **-** If there are increases in toxic air pollutant (TAP) emissions, the requirements of Washington's Controls for New Sources of Toxic Air Pollutants under Chapter 173-460 WAC are met; and,
6. ***Public Outreach*** **–** Public notice and comment requirements in ORCAA's regulations and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6 are met.

The following sections provide more detail on each criterion.

10. Applicable Performance Standards (Summary)

ORCAA's Rule 6.1.4(a)(1) and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6, require a finding that any new or modified stationary source will likely comply with applicable state, federal and local performance standards for air emissions including emission standards adopted under chapter 70A.15 RCW, emissions standard of ORCAA, and federal emission standards including New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), and National Emission

Standards for Hazardous Air Pollutants for Source Categories (MACT standards). The performance standards in Table 10.1 were determined applicable to the proposed baghouse installation. The performance standards in Table 10.2 were determined relevant to the proposed baghouse installation, but inapplicable. A comprehensive list of applicable performance standards that apply to all stationary sources of air pollution located at the facility, as well as general air regulations and standards that apply, are included in the Appendix.

Table 10.1: Applicable Performance Standards specific to the proposed baghouse

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
General Requirements WAC 173-400-040(1)(c) ORCAA Rule 8.3	All emissions units are required to use reasonably available control technology (RACT).	Applies generally to all air pollution sources.
Visible Emissions WAC 173-400-040(2) ORCAA Rule 8.2(a)	Prohibits emissions with opacity of greater than 20% for more than three (3) minutes in any one hour.	Applies generally to all air pollution sources
Particulate Matter (process units) WAC 173-400-060 ORCAA Rule 8.3(a)	No person shall cause or allow the emission of particulate material from any general process operation in excess of 0.23 grams per dry cubic meter at standard conditions (0.1 grain/dscf) of exhaust gas.	Applies to generally to all stationary process units that exhaust to the atmosphere.
Control Equipment Maintenance and Repair ORCAA Rule 8.8	ORCAA Rule 8.8 requires that all air contaminant sources keep any process and/or air pollution control equipment in good operating condition and repair.	Applies generally to all air pollution control devices.
Fallout WAC 173-400-040(3) ORCAA Rule 8.3(e)	Prohibits particulate emissions from any source to be deposited, beyond the property under direct control of the owner or operator of the source, in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material was deposited.	Applies generally to all air pollution sources.
Fugitive Emissions WAC 173-400-040(4)(a) ORCAA Rule 8.3(c)	The owner or operator of any emissions unit engaging in materials handling, construction, demolition or other operation which is a source of fugitive emission shall take reasonable precautions to prevent the release of air contaminants from the operation.	Applies generally to any activity that results in fugitive emissions.
Emissions Detrimental to Persons or Property WAC 173-400-040(6) ORCAA Rule 7.6	Prohibits causing or allowing the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business.	Applies generally to all air pollution sources
Concealment and Masking WAC 173-400-040(8) ORCAA Rule 7.5	Prohibits installation or use of any device or means to conceal or mask emissions of an air contaminant, which causes detriment to health, safety, or welfare of any person, or causes damage to property or business.	Applies generally to all air pollution sources
Fugitive Dust WAC 173-400-040(9)	The owner or operator of a source or activity that generates fugitive dust must take reasonable precautions to prevent that fugitive dust from becoming airborne and must maintain and operate the source to minimize emissions.	Applies to any activity that results in fugitive dust.

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
Excess Emissions Provisions WAC 173-400-108 WAC 173-400-109 ORCAA 8.7	Requires excess emissions be reported to the Authority as soon as possible and within 24 hours and establishes criteria qualifying excess emissions as unavoidable.	Applies generally to all air pollution sources
Record Keeping and Reporting. ORCAA Rule 8.11	Requires the following: 1. Maintenance of records on the nature and amounts of emissions and other related information as deemed necessary by ORCAA; 2. Reporting of emissions to ORCAA upon request.	Required of all facilities registered with ORCAA.

Table 10.2: Relevant Performance Standards Determined Inapplicable

Regulation Title Citation	Relevant Performance Standard Determined Inapplicable	Basis
Particulate Matter (combustion units) WAC 173-400-050 ORCAA Rule 8.3(a)	Prohibits emissions from any combustion unit in excess of 0.1 grain/dscf. EPA test methods from 40 CFR Appendix A must be used if demonstration of compliance is required.	Weyerhaeuser currently does not include any stationary combustion units.
Sulfur Dioxide WAC 173-400-040(7)	No person shall cause or allow the emission from any emissions unit in excess of one thousand ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of sixty consecutive minutes.	Weyerhaeuser currently does not emit any Sulfur Dioxide.

11. Best Available Control Technology (BACT)

ORCAA Rule 6.1.4(a)(2) and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6, require the finding that a new source or modification to an existing source of air pollution in an attainment or unclassifiable area will employ best available control technology for all pollutants (BACT) not previously emitted or whose emissions would increase as a result of the new source or modification.

New sources of air pollution and modifications to existing sources of air pollution are required to use BACT to control all pollutants not previously emitted, or those for which emissions would increase as a result of the new source or modification. BACT is defined in WAC 173-400-030 as, *"an emission limitation based on the maximum degree of reduction for each air pollutant subject to regulation under chapter 70A.15 RCW emitted from or which results from any new or modified stationary source, which the permitting authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes and available methods, systems, and techniques, including fuel cleaning, clean fuels, or treatment or innovative fuel combustion techniques for control of each pollutant."*

Weyerhaeuser proposed a control efficiency of 99% for particulates, which is a reasonable level of control for the baghouse. Based on experience with similar cases, ORCAA staff agree the proposed standard meets BACT for this case. Additionally, ORCAA will require an opacity BACT standard of 0% (zero percent) for all point source emissions (the baghouse exhaust).

12. Ambient Impact Analysis (Criteria Pollutants)

ORCAA's Rule 6.1.4(a)(3) and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6, require emissions from any new stationary source or modification not delay the attainment date of an area not in attainment, nor cause or contribute to a violation of any Ambient Air Quality Standard (AAQS). ORCAA's current Dispersion Modeling Guidance (2009) recommends this approval criteria be demonstrated using dispersion modeling techniques when Potential to Emit (PTE) of any pollutant with an ambient standard is above ORCAA's adopted significant emission level for the pollutant. Any pollutant with a PTE below its significant emission level can be considered insignificant with respect to maintaining the AAQSs.

The potential to emit for all criteria pollutants (1.2 TPY for PM, PM_{10}, and $PM_{2.5}$) are below their respective significant emission level (2.5 tpy for PM and 1.5 tpy for PM_{10} and $PM_{2.5}$) identified in ORCAA's Dispersion Modeling Guidance (2009). Therefore, an ambient air quality analysis is not required and it can be concluded emissions are sufficiently low and will not cause or contribute to violation of any ambient air quality standard.

13. Ambient Impact Analysis (Toxic Air Pollutants)

Washington's regulation titled Controls for New Sources of Toxic Air Pollutants (Air Toxics Rule) under Chapter 173-460 of the Washington Administrative Code applies to new stationary sources of Toxic Air Pollutants (TAP), including modifications to existing emissions units that increase TAP. The purpose of the Air Toxics Rule is to, "... maintain such levels of air quality as will protect human health and safety." The TAPs covered under the Air Toxics Rule include carcinogens and non-carcinogens. TAP emissions increases for determining applicability are the increases attributable to the new or modified emissions unit - Decreases from existing emissions units are not allowed to be subtracted from project-attributable TAP increases when determining applicability. Also, the Air Toxics Rule provides that review of modifications are limited to the emission unit or units proposed to be modified and the TAPs whose emissions would increase as a result of the modification.

The Air Toxics Rule has two independent requirements for new sources and modifications that increase TAP emissions above de-minimis levels:

1) **tBACT:** The new or modified emission units must use Best Available Control Technology to control TAP emissions (WAC 173-460-040(3)(a)).
2) **Ambient Impact:** The NOC application must demonstrate that any increase in TAP from the new or modified emission units are sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects (WAC 173-460-070).

tBACT

The tBACT requirement applies to any new or modified emission units that triggers the Air Toxics Rule (results in a TAP increase above de-minimis levels), regardless of facility-wide or "net" TAP emissions. The term tBACT means Best Available Control Technology, as that term is defined in WAC 173-400-030, but applied to control of TAP (see BACT definition in Section 11).

There are no TAP associated with the project; therefore, tBACT is not required.

Ambient Impact Review

The Air Toxics Rule provides a multi-tiered, screening approach under WAC 173-460-080 to assess health impacts and demonstrate compliance with the ambient impact requirement under WAC 173-460-070, which is that TAP increases must be sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects.

The "First Tier Review" (Tier 1 Review) is a two-step process. First, the emissions increase of each TAP is compared to its unique Small Quantity Emission Rate (SQER). SQERs are listed for each TAP under WAC 173-460-150. An SQER is the level of emissions of a TAP below which dispersion modeling is not required to demonstrate compliance with the ambient impact requirement. TAP emissions increases used in this first step must be based on the maximum potential to emit considering control or reduction in emissions achievable using the air pollution control technology or methods proposed to meet the tBACT requirement. Any TAP with an increase below its SQER can be presumed to be in compliance with the ambient impact requirement. If this is the outcome, further analysis is not required for that TAP. However, TAPs with emissions increases above their SQER must undergo the second step of the Tier 1 Review.

The second step of the Tier 1 Review requires evaluating TAP impacts against Acceptable Source Impact Levels (ASIL) and is referred to as an ASIL Analysis. An ASIL is the adopted health-based concentration for a TAP below which can be presumed as meeting the ambient impact requirement of WAC 173-460-070. ASILs are provided for each TAP under WAC 173-460-150. An ASIL analysis typically involves using an ambient air dispersion model to estimate ambient concentrations resulting from TAP emissions increases and considering air dispersion and local meteorological characteristics of the source. If the modeled impact of the increase in emissions of a TAP does not exceed its corresponding ASIL, the ambient impact requirement of WAC 173-460-070 may be considered met and the First Tier Review is completed for that TAP.

Emissions rates used to support an ASIL Analysis must be based on the maximum potential to emit considering control or reduction in emissions achievable using the air pollution control technology or methods proposed to meet the tBACT requirement. In addition, the Air Toxics Rule allows TAP reductions from existing emission units not subject to review to be subtracted or "netted out" from TAP increases, provided the reductions are included in the approval order as enforceable voluntary emission limits and meet all the requirements of WAC 173-460-071. These requirements include:

(1) The voluntary emissions reductions must be enforceable through a regulatory order issued by the air permitting agency.

(2) The approval order enforcing the voluntary emissions reductions must include monitoring, recordkeeping, and reporting requirements sufficient to ensure the reductions are maintained.
(3) The agency's preliminary determination to approve the voluntary emissions reductions are subject to a 30-day public notice and comment period and opportunity for a public hearing.

For pollutants with ambient concentrations found to be greater than their ASIL, a "Second Tier Review" (Tier 2 Review) by the Washington Department of Ecology (Ecology) is required. An application for a Tier 2 Review by Ecology is referred to a Tier 2 petition. Tier 2 petitions must include a Health Impacts Assessment (HRA) and estimated ambient TAP impacts based on refined air dispersion modeling. Ecology will not act on a Tier 2 petition unless a written preliminary determination on the NOC application for the new or modified TAP source and a draft approval order have been completed by the local agency with jurisdiction. Ecology's review and approval of a Tier 2 petition is contingent on a finding that TAP impacts meet the ambient impact requirement of WAC 173-460-070 that increases in TAP emissions are sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects. If Ecology recommends denial of a Tier 2 petition, the permitting authority may not approve the project. The applicant then has the option of submitting a petition for a "Third Tier Review" (Tier 3 Review) by Ecology and a request for a risk management decision.

There are no TAP associated with the project; therefore, an ambient impact review is not required.

14. Requirements for Major Stationary Sources and Major Modifications to Major Stationary Sources

Projects that are major stationary sources and major modifications to major stationary sources as defined in 40 CFR 52.21(b) may be subject to permitting requirements under WAC 173-400-700 through 173-400-860.

Weyerhaeuser is not a "Major Stationary Source" as defined in 40 CFR 52.21(b) and not subject to the permitting program required by WAC 173-400-700 through WAC 173-400-860. Therefore, these permitting requirements do not apply.

15. Title V Air Operating Permit (AOP) Implications

The State of Washington program pursuant to Title V of the federal Clean Air Act is governed under Chapter 173-401 WAC, the Washington Air Operating Permit Program. Chapter 173-401 WAC requires existing major stationary sources to operate in compliance with an approved Air Operating Permit (AOP). Major stationary sources are those stationary sources with a potential to emit which is greater than 100 tons per year of any criteria pollutant, greater than 10 tons per year of any hazardous air pollutants (HAP), or greater than 25 tons per year of any combination of HAP.

Weyerhaeuser is not a "Major Source" under the Title V program and is not subject to the requirement to operate under an AOP.

16. Environmental Justice Considerations

EPA defines Environmental Justice (EJ) as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. The purpose of an EJ review in conjunction with an air permitting action is to ensure no group of people bear a disproportionate share of the negative environmental consequences as the result of the permitting action. Further, ORCAA strives to engage the affected community effectively and meaningfully regarding the permitting action, and to ensure compliance with obligations pursuant to Title VI of the Civil Rights Act. With respect to factoring EJ into air permitting decisions, EPA Region 10 expects air agencies to:

· Identify overburdened communities;

· Engage with communities;

· Evaluate cumulative impacts; and,

· Use available authority to minimize emissions.

However, EPA Region 10 does not expect air agencies to use the Clean Air Act's authorities to address existing disproportional impacts to communities when implementing New Source Review in areas that are "attainment/unclassifiable" with respect to meeting the NAAQS.

The following subsections describe how these expectations from EPA Region 10 were met.

16.1 Identify Overburdened Communities

The initial step in an EJ review is to identify any affected populations or communities of concern and to identify whether they are disproportionally impacted. ORCAA used EPA's environmental justice screening and mapping tool, EJScreen, to answer this first part of this question. An EJScreen Community Report was generated for Thurston County. The Community Report estimates a minority population of 27%, with approximately 4% of the total population speaking Spanish and 8% speaking another Non-English language at home. All demographic indicators were below the 80th percentile for the nation. Likewise, the Community Report indicates that Thurston County is below the 80th percentile for all environmental indicators. Environmental indicators above the 80th percentile are an indication that a community is already disproportionately impacted. Therefore, ORCAA staff's conclusion is that the project impact area does not include any preexisting, overburdened communities. A copy of the Community Report with more detailed information will be filed as part of the supporting documentation for the project.

Preexisting air quality impacts were evaluated based on ambient air quality monitoring data and designation of the area with respect to maintaining compliance with the NAAQS. If air quality in a

geographic area meets or is cleaner than a national standard based on ambient air monitoring data, it is called an attainment area and designated "attainment/unclassifiable." Areas may also be presumed "attainment/unclassifiable" based on population density and air pollutant emissions being below certain thresholds. For this case, the project impact area and Thurston County as a whole is designated "attainment/unclassifiable." Therefore, there are no preexisting nonattainment issues identified within the County. The project's criteria emissions will not cause or contribute to a violation of an AAQS. Therefore, ORCAA staff's conclusion is that there are no indications of any existing disproportional impacts to communities of concern within the project impact area.

16.2 Engage with Communities

Based on the size and scope of the project, and that there are no overburdened communities near the project, ORCAA staff determined the public noticing procedures outlined in Section 7 above are sufficient notifications.

16.3 Evaluate Cumulative Impacts

The air permitting action for this case did not trigger a cumulative impacts analysis under either the Clean Air Act or the Washington Clean Air Act. Emissions of all criteria pollutants were below their respective modeling thresholds and will not contribute to a violation of a NAAQS.

16.4 Use Available Authority to Minimize Emissions

As described elsewhere in this report, ORCAA applied existing New Source Review authorities provided under the Clean Air Act and the Washington Clean Air Act to minimize emissions from the baghouse installation project. Principally among these authorities is the requirement to use BACT for controlling emissions. The BACT requirement was applied and corresponding BACT emissions limits are included in the air permit.

17. Conditions of Approval

The following conditions of approval were determined necessary for assuring compliance with applicable air regulations and standards and protecting air quality. Recommended conditions of approval will become effective once the Approval Order is issued:

1. **Approved Equipment.** The cone processing plant exhaust system as described in Notice of Construction application No. 24NOC1636 and the associated Final Determination is approved for construction and operation subject to conditions in this Order of Approval. [Regulatory Basis: ORCAA 6.1(a); ORCAA 6.1.2(l); 40 CFR part 52.2470(c), Table 6]

2. **Preapproval Required.** Prior approval by ORCAA may be required for the following as specified in ORCAA Rule 6.1:

a. Construction, installation, or establishment of any stationary source;
b. Modification to any existing stationary source;
c. Replacement or substantial alteration of emission control technology installed on an existing stationary source; or,
d. Deviations from the approved plans, drawings, data, and specifications of the stationary sources listed in Table 1.

Table 1 Stationary sources located at Weyerhaeuser

Emission Unit	Specifications:
EU1- Cone processing plant exhaust system	Exhaust system with pickup points at tumbler, scalper, and screens. Exhaust controlled by baghouse **Baghouse** Manufacturer: TBD Make: TBD Pressure Drop: TBD Design Airflow: Up to 10,000 ACFM Cleaning Mechanism: Pulse Jet or equivalent Control Efficiency: 99% or better

[Regulatory Basis: ORCAA 6.1(a); ORCAA 6.1.2(l); WAC 173-400-110(2); WAC 173-400-111(10)]

3. **BACT Limits**
   a) Opacity: Visible emissions from the baghouse must not exceed 0% (zero percent) opacity during any 6-minute average period in accordance with as determined by EPA Reference Method 9 of 40 CFR Part 60, Appendix A.
   b) Filter Efficiency: The filter efficiency of the bags must have an effective rating of 99% or better. Published filter efficiency data provided by the manufacturer or laboratories is sufficient for the purposes of demonstrating compliance with this requirement.

   [Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2)]

4. **O&M Plan** The owner or operator must devise, implement, and update, when necessary, an Operations and Maintenance (O&M) plan for assuring air pollution control systems are maintained in good operating condition and repair. The plan must include but is not limited to standard procedures for the following:
   a) The immediate vicinity of the baghouse must be kept clean to minimize emissions to the ambient atmosphere. At a minimum, this can include regularly unloading the hoppers, sweeping the area, and adequate disposal of the waste.
   b) Weekly self-inspections of the baghouse must be conducted to ensure the doors/seals and surrounding ductwork are fully sealed.
   c) Weyerhauser must establish minimum and maximum pressure drops which are indicative of good operation and repair for the baghouse. Pressure drop must be monitored at least daily when the cone processing line is operational.

   [Regulatory Basis: ORCAA Rule 6.1.4(a)(2); ORCAA Rule 4.3(g); 40 CFR part 52.2470(c), Table 6]

5. **Record Keeping.** The following records must be kept and made available upon request:

a) The written O&M plan required by Condition #4.
b) Records must be kept sufficient to verify the average arrestance (filtration) ratings of each baghouse filter material type. Published filter efficiency data provided by filter vendors or laboratories may be used to demonstrate compliance with this requirement.
c) Records demonstrating weekly self-inspections of the baghouse were conducted. For the purposes of demonstrating compliance, a checklist can be made.
d) Records of daily pressure drops on days the baghouse operates.
e) Records of corrective actions taken in response to out-of-range pressure drops.

[Regulatory Basis: ORCAA 8.11; 40 CFR part 52.2470(c), Table 6]

18. Final Determination to Approve

This Final Determination documents ORCAA staff's determinations with respect to the applicable criteria of approval in ORCAA Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6. ORCAA staff recommends approval of Weyerhaeuser's proposed baghouse replacement project, provided the conditions identified in Section 17 of this Final Determination are implemented through an enforceable Order of Approval (AKA: Air Permit). Emissions calculations, modeling summary and other data supporting this Final Determination are provided as attachments.

~ end of section ~

PREPARED BY: Aaron Manley, PE	4/10/2024 Date
REVIEWED BY: Jennifer DeMay, PE	4/10/2024 Date

Attachments

Applicable Performance Standards that apply to Weyerhaeuser

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
Registration ORCAA Regulation 4	Requires facilities that are minor sources of emissions to register annually with ORCAA and pay annual registration fees.	Weyerhaeuser will continue to be a minor source requiring registration.
Annual Registration Fees ORCAA Rule 3.1	Requires payment of annual registration fees to ORCAA based in part on air pollutants emitted during the previous year.	Weyerhaeuser is required to register and pay annual registration fees.
Initial Notification ORCAA Rule 4.3(a)&(b); 4.3(f)	Requires facilities subject to registration to register by submitting an initial notification with the information in ORCAA Rule 4.3(b) within 30 days from: 1) Commencement of operation of any new or recommissioned stationary source; 2) Change in ownership of existing registered stationary source. The notification must be signed by the owner or operator or by the agent appointed by the owner.	
Administrative Change Notification ORCAA Rule 4.3(e); 4.3(f)	Requires facilities to notify ORCAA of any changes to administrative information within 30 days from the change taking place including, but not limited to, contact names, address, phone numbers, and permanent shut down or decommissioning of a stationary source. The notification must be signed by the owner or operator or by the agent appointed by the owner.	
Annual and/or Periodic Reports ORCAA Rule 4.3(c)&(d); 4.3(f)	Requires stationary sources to submit reports with information directly related to the registration program when requested by the Agency within 30 days of receipt of the request. The submittal must be signed by the owner or operator or by the agent appointed by the owner.	
Interference or Obstruction ORCAA Rule 7.1	Prohibits willfully interfering with or obstructing the Executive Director or any Agency employee in performing any lawful duty.	Applies generally to all air pollution sources
False or Misleading Statements ORCAA Rule 7.2	Prohibits any person from willfully making a false or misleading statement to the Board or its representative as to any matter within the jurisdiction of the Board.	Applies generally to all air pollution sources
Unlawful Reproduction or Alteration of Documents ORCAA Rule 7.3	Prohibits reproducing or altering, or causing to be reproduced or altered, any order, registration certificate or other paper issued by the Agency if the purpose of such reproduction or alteration is to evade or violate any provision of these Regulations or any other law.	Applies generally to all air pollution sources
Display of Orders and Certificates ORCAA Rule 7.4	Any order or registration certificate required to be obtained by these Regulations shall be available on the premises designated on the order or certificate. In the event that the Agency requires order or registration certificate to be displayed, it	The Approval Order issued in conjunction with this NOC approval must be retained on site.

Attachments

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
	shall be posted. No person shall mutilate, obstruct, or remove any order or registration certificate unless authorized to do so by the Board or the Executive Director.	
General Requirements WAC 173-400-040(1)(c) ORCAA Rule 8.3	All emissions units are required to use reasonably available control technology (RACT).	Applies generally to all air pollution sources.
Visible Emissions WAC 173-400-040(2) ORCAA Rule 8.2(a)	Prohibits emissions with opacity of greater than 20% for more than three (3) minutes in any one hour.	Applies generally to all air pollution sources
Sulfur Dioxide WAC 173-400-040(7)	No person shall cause or allow the emission from any emissions unit in excess of one thousand ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of sixty consecutive minutes.	Applies generally to facilities that emit Sulfur Dioxide.
Control Equipment Maintenance and Repair ORCAA Rule 8.8	ORCAA Rule 8.8 requires that all air contaminant sources keep any process and/or air pollution control equipment in good operating condition and repair.	Applies generally to all air pollution control devices.
Fallout WAC 173-400-040(3) ORCAA Rule 8.3(e)	Prohibits particulate emissions from any source to be deposited, beyond the property under direct control of the owner or operator of the source, in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material was deposited.	Applies generally to all air pollution sources.
Fugitive Emissions WAC 173-400-040(4)(a) ORCAA Rule 8.3(c)	The owner or operator of any emissions unit engaging in materials handling, construction, demolition, or other operation which is a source of fugitive emission shall take reasonable precautions to prevent the release of air contaminants from the operation.	Applies generally to any activity that results in fugitive emissions.
Odor WAC 173-400-040(5) ORCAA Rule 8.5	ORCAA Rule 8.5 contains general requirements for controlling odors and a general prohibition of odors that unreasonably interfere with the use or enjoyment of a person's property.	Applies generally to all air pollution sources.
Emissions Detrimental to Persons or Property WAC 173-400-040(6) ORCAA Rule 7.6	Prohibits causing or allowing the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business.	Applies generally to all air pollution sources
Concealment and Masking WAC 173-400-040(8) ORCAA Rule 7.5	Prohibits installation or use of any device or means to conceal or mask emissions of an air contaminant, which causes detriment to health, safety, or welfare of any person, or causes damage to property or business.	Applies generally to all air pollution sources
Fugitive Dust WAC 173-400-040(9)	The owner or operator of a source or activity that generates fugitive dust must take reasonable precautions to prevent that fugitive dust from	Applies to any activity that results in fugitive dust.

Attachments

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
	becoming airborne and must maintain and operate the source to minimize emissions.	
Excess Emissions Provisions WAC 173-400-107; WAC 173-400-108 ORCAA 8.7	Requires excess emissions be reported to the Agency as soon as possible and within 24 hours and establishes criteria qualifying excess emissions as unavoidable.	Applies generally to all air pollution sources
Record Keeping and Reporting. ORCAA Rule 8.11	Requires the following: 1. Maintenance of records on the nature and amounts of emissions and other related information as deemed necessary by ORCAA; 2. Reporting of emissions to ORCAA upon request.	Required of all facilities registered with ORCAA.
Particulate Standards for Process units ORCAA Rule 8.3(a) WAC 173-400-060	Prohibits emissions from any process unit in excess of 0.1 grain/dscf. EPA test methods from 40 CFR Appendix A shall be used should demonstration of compliance be required.	Applies to generally to all stationary process units that exhaust to the atmosphere.

OLYMPIC REGION CLEAN AIR AGENCY

2940 Limited Lane NW - Olympia, Washington 98502 - 360-539-7610 – Fax 360-491-6308

FORM 1- NOTICE OF CONSTRUCTION

TO CONSTRUCT - INSTALL - ESTABLISH OR MODIFY AN AIR CONTAMINANT SOURCE

Form 1 Instructions:

1. Please complete all the fields below. **This NOC application is considered incomplete until signed.**
2. If the application contains any confidential business information, please complete a Request of Confidentiality of Records (www.orcaa.org/forms).
3. Duty to Correction Application: An applicant has the duty to supplement or correct an application. Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application must, upon becoming aware of such failure or incorrect submittal, promptly submit supplementary factors or corrected information.

Business Name:
Weyerhaeuser NR Company - Rochester Seed Plant

Mailing Address:
7935 US 12, Rochester, WA 98759

Physical Address of Project or New Source:
7935 US 12, Rochester,WA 98759

Billing Address:
7935 US 12, Rochester, WA 98759

For ORCAA use only

File No: 344
County No: 67
Source No: 160
Application No: 24NOC1636

Date Received:

Received
FEB 02 2024
ORCAA

Project or Equipment to be installed/established:

10,000 ACFM Bagfilter

Anticipated startup date: 05 / 01 / 2024 Is facility currently registered with ORCAA? Yes ☐ No ☑

This project must meet the requirements of the State Environmental Policy Act (SEPA) before ORCAA can issue final approval. Indicate the SEPA compliance option:

☐ SEPA was satisfied by _____ (government agency) on ___/___/___ (date) - Include a copy of the SEPA determination

☐ SEPA threshold determination by _____ (government agency) is pending - Include a copy of the environmental checklist

☐ ORCAA is the only government agency requiring a permit - Include ORCAA Environmental Checklist

☑ This project is exempt from SEPA per WAC 197-11-800 (3) (WAC citation).

Name of Owner of Business:
Weyerhaeuser Corporation

Title:

Email: | Phone:

Authorized Representative for Application (if different than owner):
Viviana Olivares

Title: Project Manager

Email: viviana.olivares@weyerhaeuser.com | Phone: 360-480-7629

I hereby certify that the information contained in this application is, to the best of my knowledge, complete and correct.

Signature of Owner or Authorized Representative: (sign in Blue Ink)

Date: 1/31/24

IMPORTANT: Do not send via email or other electronic means. ORCAA must receive Original, hardcopy, signed application and payment prior to processing application.

Agency Use Only

CONDITIONALLY APPROVED
FOR CONSTRUCTION ONLY
IN ACCORDANCE WITH
RCW 70A.15, WAC 173-400
ORCAA REGULATIONS
(SEE ATTACHED ADDENDUM FOR
CONDITIONS OF APPROVAL)

4/10/2024
DATE

ORCAA

Revised 2/11/2020