


FW: Weyerhaeuser Raymond CDK Second Tier Review

Palcisko, Gary (ECY) <gpal461@ECY.WA.GOV>

Mon 10/2/2023 4:37 PM

To: Friedman, Beth (ECY) <BEFR461@ECY.WA.GOV>; Lucke, Catherine (ECY) <cluc461@ECY.WA.GOV>

Cc: Aaron Manley <aaron.manley@orca.org>

 1 attachments (4 MB)

2023-0906 Raymond CDK Second Tier Review HIA Protocol.pdf;

Hi Beth and Catherine,

I looked over the HIA protocol. Just a few things stood out to me.

- Merged stack parameters
 - This is something I am not familiar with. These kilns are different than the batch kilns we are accustomed to reviewing. I remember them saying something about merged stacks in their pre-application meeting, but I have some questions about the flow rates through these stacks. The stack diameter is 1.18 m, and the exit velocity is 21.75 m/s. For comparison, the batch kiln applications we've reviewed in the past had numerous vents along the top of lumber kiln with very low exit velocity typically less than 1.5 m/s. These low temp / low flow rate assumptions have notoriously made lumber kiln emissions difficult regarding air toxics concentration at the ambient boundary. We should check this merged – stack concept with Aaron at ORCAA to make sure it makes sense to him from a design point of view.
- They presented California OEHHA toxicity values. I think that's fine, but I will also evaluate risks using EPA toxicity values. Based on their maximum concentrations that they report in the protocol. They will not run into too much trouble meeting acceptability criteria regardless of which toxicity values they use.
- They said they will use NATA to define background concentration of TAPs. I will request that they use the latest publicly available AirToxScreen instead.

Let me know if there are any issues that you've identified, and I'll prepare a combined response to the consultant.

From: Beth Ryder <bRyder@trinityconsultants.com>

Sent: Tuesday, September 26, 2023 12:24 PM

To: Palcisko, Gary (ECY) <gpal461@ECY.WA.GOV>

Cc: Cameron, Angela(Southern Design Services, Inc) <Angela.Cameron@weyerhaeuser.com>; Carter, Jack <Jack.Carter@weyerhaeuser.com>; Maddie Coates <Madison.Coates@trinityconsultants.com>; Nancy Liang <NLiang@trinityconsultants.com>

Subject: RE: Weyerhaeuser Raymond CDK Second Tier Review

Gary, please see attached document. The form in Appendix A is unsigned in this version, but a signed copy was sent.

Best,
Beth

Beth Ryder

Managing Consultant

P 458.206.6770

8705 SW Nimbus Ave, Suite 350, Beaverton, OR 97008

Email: bryder@trinityconsultants.com

Upcoming Events:

[09/13/23 – Complimentary Webinar: Reducing Cradle-to-Grave Liability For Hazardous Waste Generation in Washington, Oregon, and Idaho \(ONLINE\)](#)

[09/20-21/23 – Data Center Environmental Permitting and Compliance \(SEATTLE\)](#)

[10/10-11/23 – Introduction to OSHA Regulations \(PORTLAND\)](#)

[10/12/23 – EHS Audit Skills and Techniques \(PORTLAND\)](#)

[10/18/23 – Waste Management Workshop – Developing Sustainable Waste Programs \(SEATTLE\)](#)

[11/08-09/23 – Environmental Reporting Requirements in Oregon \(PORTLAND\)](#)

From: Palcisko, Gary (ECY) <gpal461@ECY.WA.GOV>

Sent: Tuesday, September 26, 2023 12:19 PM

To: Beth Ryder <bRyder@trinityconsultants.com>

Cc: Cameron, Angela(Southern Design Services, Inc) <Angela.Cameron@weyerhaeuser.com>; Carter, Jack <Jack.Carter@weyerhaeuser.com>; Maddie Coates <Madison.Coates@trinityconsultants.com>; Nancy Liang <NLiang@trinityconsultants.com>

Subject: RE: Weyerhaeuser Raymond CDK Second Tier Review

Hi Beth,

I have not received the protocol. I was notified by our fiscal department last week that we received the fee payment, but they did not indicate that there was any accompanying protocol. Can you send me a PDF version of the protocol?

From: Beth Ryder <bRyder@trinityconsultants.com>

Sent: Tuesday, September 26, 2023 10:14 AM

To: Palcisko, Gary (ECY) <gpal461@ECY.WA.GOV>

Cc: Cameron, Angela(Southern Design Services, Inc) <Angela.Cameron@weyerhaeuser.com>; Carter, Jack <Jack.Carter@weyerhaeuser.com>; Maddie Coates <Madison.Coates@trinityconsultants.com>; Nancy Liang <NLiang@trinityconsultants.com>

Subject: Weyerhaeuser Raymond CDK Second Tier Review

Gary,

Weyerhaeuser submitted the HIA modeling protocol for their Raymond, WA facility to install a Continuous Direct Fired Kiln (CDK) in mid September. I wanted to check in and verify you'd received the protocol and ask if you have any questions or would like to discuss the document further.

Best,
Beth

Beth Ryder

Managing Consultant

P 458.206.6770

8705 SW Nimbus Ave, Suite 350, Beaverton, OR 97008

Email: bryder@trinityconsultants.com



Connect with us: [LinkedIn](#) / [Facebook](#) / [Twitter](#) / [YouTube](#) / trinityconsultants.com

Stay current on environmental issues. [Subscribe](#) today to receive Trinity's free *EHS Quarterly*.

Upcoming Events:

[09/13/23 – Complimentary Webinar: Reducing Cradle-to-Grave Liability For Hazardous Waste Generation in Washington, Oregon, and Idaho \(ONLINE\)](#)

[09/14/23 – Complimentary Webinar: Washington Regulatory Update \(ONLINE\)](#)

[09/20-21/23 – Data Center Environmental Permitting and Compliance \(SEATTLE\)](#)

[09/28/23 – Navigating U.S. Environmental Regulations for Canadian Managers \(VANCOUVER, BC\)](#)

[10/10-11/23 – Introduction to OSHA Regulations \(PORTLAND\)](#)

[10/11-12/23 – Environmental Reporting Requirements in Idaho \(BOISE\)](#)

[10/12/23 – EHS Audit Skills and Techniques \(PORTLAND\)](#)

[10/18/23 – Waste Management Workshop – Developing Sustainable Waste Programs \(SEATTLE\)](#)

[11/08-09/23 – Environmental Reporting Requirements in Oregon \(PORTLAND\)](#)

[11/14/23 – Air Quality Permitting in Washington \(SEATTLE\)](#)

[11/15-16/23 – Environmental Reporting Requirements in Washington \(SEATTLE\)](#)



CAUTION: This email originated from outside of the Trinity Consultants organization. Do not click links or open attachments unless you recognize the sender's name, sender's email address and know the content is safe.

ATTENTION: This email came from outside of ORCAA's system. Use caution when replying, or when opening attachments unless you know the sender *and* were expecting the attachment.