

**RE: Weyerhaeuser 23NOC1614 - Concurrent Operation Question**

Nancy Liang <NLiang@trinityconsultants.com>

Tue 1/2/2024 9:21 AM

To: Aaron Manley <aaron.manley@orcaa.org>; Beth Ryder <bRyder@trinityconsultants.com>

Cc: Lauren Whybrew <lauren.whybrew@orcaa.org>

Hi Aaron- Happy New Year! I'm checking to see how the draft permit is coming along.

**Nancy Liang** (she/her)

**Please Note New Phone Number**

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**From:** Aaron Manley <aaron.manley@orcaa.org>

**Sent:** Friday, December 22, 2023 3:41 PM

**To:** Beth Ryder <bRyder@trinityconsultants.com>; Nancy Liang <NLiang@trinityconsultants.com>

**Cc:** Lauren Whybrew <lauren.whybrew@orcaa.org>

**Subject:** Weyerhaeuser 23NOC1614 - Concurrent Operation Question

Hi, Beth and Nancy. Depending on when you get this, I hope you have/had a nice weekend.

I'm close to completing my initial draft of the Weyerhaeuser permit and I'm currently on the ambient impacts section. In our meeting with you and Weyerhaeuser last month, at the tail end of the meeting there was the discussion of concurrent operation of the CDK and the existing boiler and kilns. As I remember the meeting, you did not seem to think there would be concurrent operation while Weyerhaeuser staff believed there would be, and decided you would get back to us on the matter, though I could be mistaken.

The calculations and modeling spreadsheet (2023-1127 Weyco Raymond CDK v6.0\_ORCAA) I reviewed is very well done, though it does not appear to address concurrent operation PTE, criteria pollutant impacts, or TAP modeled impacts and I just want to make sure I didn't miss or misinterpret anything. I've been waiting for an update to include concurrent operation information into the permit, working on other aspects of the permit, and I'm almost at the point where I need the concurrent operation information to continue. Normally I would wait until I finish my review to send an updated data request all at once, but as time is of the essence I thought it might be prudent to ask now. Is the plan still for concurrent operation during the CDK commissioning phase? If yes, did you send the concurrent operation PTE, modeling, and results to us and I just missed them? I received the synthetic minor order limit request of 249 TPY for VOCs today, so I am still assuming the plan is concurrent operation for the commissioning period.

You may already be putting these items together and I don't mean to rush you if that's the case. I just don't want to delay the project if I misunderstood or missed anything. **If concurrent operations are part of the proposal, the application is incomplete. Items needed at this point to consider the application 'complete':**

1. Calculations, PTE, and modeled impacts or netting as applicable demonstrating compliance with NAAQS, TAP ASILs or SQERs, and ORCAA's formaldehyde rule (ORCAA 8.6(b)).

2. The calculations spreadsheet you supplied previously is great. If you use those same emissions factors and resubmit the updated spreadsheet, letting me know what operations/assumptions were changed will expedite my review.

In the meantime, I'll continue writing the permit. I might have additional required items once I complete my review. Let me know if you have any questions or need anything else.

Sincerely,

Aaron Manley, P.E.

*Engineer II*

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