

Re: Weyerhaeuser 23NOC1614 - Items Needed

Aaron Manley <aaron.manley@orca.org>

Tue 3/12/2024 9:51 AM

To: Nancy Liang <NLiang@trinityconsultants.com>; matt.goldman@trinityconsultants.com

<Matt.Goldman@trinityconsultants.com>

Cc: Yanik, Christine <Christine.Yanik@weyerhaeuser.com>; Jennifer DeMay <jennifer.demay@orca.org>

Hello. The proposed CDK BACT limits for PM, CO, NOx, and SO2 are in lb/MBF. It was asked **how, until an approved testing method for CDK's is approved, the facility proposes to monitor/demonstrate compliance with the CDK BACT limits?**

Please include this item in your response to my 3-11-2024 email questions.

Sincerely,

Aaron Manley, P.E.

Engineer II

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Olympic Region Clean Air Agency

[2940 Limited Lane NW](#)[Olympia, WA 98502](#)[\(360\) 539-7610 x 104](#)www.orca.org

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From: Aaron Manley**Sent:** Monday, March 11, 2024 4:32 PM**To:** Nancy Liang <NLiang@trinityconsultants.com>; matt.goldman@trinityconsultants.com

<Matt.Goldman@trinityconsultants.com>

Cc: Yanik, Christine <Christine.Yanik@weyerhaeuser.com>; Jennifer DeMay <jennifer.demay@orca.org>**Subject:** Weyerhaeuser 23NOC1614 - Items Needed

Hello. I'm addressing comments received from ORCAA's internal review on the current draft. I know you're anxious to get a draft to review so I'm sending you items as I receive them. ORCAA had a discussion about the current draft and items needed in order to complete our review so we can get out a preliminary determination. ORCAA requires the following to make a determination:

1. There is concern regarding the ratio of emissions exiting the vapor extraction points. Please provide documentation how the '80% of emissions are extracted through the vapor extraction units' number was reached (HVAC calculations, computation via fluid dynamics, etc.).

2. As discussed in the meeting last week, ORCAA is still waiting on the BACT cost analysis with vendor-invoices/cost estimates to demonstrate economic feasibility/infeasibility of add-on controls. The results should be in current (2023 or 2024) dollars.
3. There is still discussion regarding adding hoods to the ends of the kilns to capture emissions escaping the ends of the CDK. As an addendum to the BACT cost analysis described in item 2, please include in the BACT analysis a comparison demonstrating the feasibility of incorporating add-on hoods with fans to vertically disperse emissions escaping the ends of the CDK as well as allow source testing of the CDK.

Feel free to contact me with any questions.

Sincerely,

Aaron Manley, P.E.

Engineer II

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