

RE: Weyerhaeuser Raymond Synthetic Minor Limit

Lim, MengChiu (ECY) <mlim461@ECY.WA.GOV>

Mon 12/11/2023 12:08 PM

To: Nancy Liang <NLiang@trinityconsultants.com>; Aaron Manley <aaron.manley@orca.org>
Cc: Cameron, Angela <Angela.Cameron@weyerhaeuser.com>; Carter, Jack <Jack.Carter@weyerhaeuser.com>; Yanik, Christine <Christine.Yanik@weyerhaeuser.com>; Nolan, Michael <Michael.Nolan@weyerhaeuser.com>; Beth Ryder <bRyder@trinityconsultants.com>

Hi,

I think it is acceptable to establish emission cap to avoid major source classification. In terms of what numerical limitation is reasonable, I think it should take into consideration of the reliability and the accuracy of the compliance method.

I personally do not have a set preference. My general approach is the closer the cap is to 250 tpy, the more details I expect in compliance demonstration. ORCAA might have their own preference how conservative the approach has to be.

Please provide me a copy of the application if Weyerhaeuser Raymond did propose a cap.
I can share my thought when there are more details in the proposal.

MengChiu Lim, PE.
Air Quality Program
WA Department of Ecology
Office: 360-995-3448

From: Nancy Liang <NLiang@trinityconsultants.com>
Sent: Monday, December 11, 2023 11:39 AM
To: Lim, MengChiu (ECY) <mlim461@ECY.WA.GOV>; Aaron Manley <aaron.manley@orca.org>
Cc: Cameron, Angela <Angela.Cameron@weyerhaeuser.com>; Carter, Jack <Jack.Carter@weyerhaeuser.com>; Yanik, Christine <Christine.Yanik@weyerhaeuser.com>; Nolan, Michael <Michael.Nolan@weyerhaeuser.com>; Beth Ryder <bRyder@trinityconsultants.com>
Subject: Weyerhaeuser Raymond Synthetic Minor Limit

Hi Mengchiu- Nice talking with you. To recap our conversation, we discussed that it is acceptable for Weyerhaeuser Raymond facility to request a VOC synthetic minor limit of 249 tpy. The Raymond facility will track their facility-wide VOC emissions during the commissioning period when both the batch kilns and continuous dry kilns will be operating. Once the batch kiln shuts down, the site will be a true minor source since the facility-wide VOC potential emissions will be below 250 tpy.

[@Aaron](#)- Ecology's guidance is in line with our discussion. Please let us know if Weyerhaeuser can request the VOC synthetic minor limit in the same application. Thanks!

Nancy Liang, P.E. (she/her)
Managing Consultant
Sustainability Practice Lead – West Region

Please Note New Phone Number

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[12/13/23 – Complimentary Webinar: Environmental Regulatory Outlook in Idaho – Hot Topics and Annual Compliance Reporting Updates for Planning Your 2024 \(ONLINE\)](#)

[12/14/23 – Complimentary Webinar: Environmental Regulatory Outlook in Oregon – Hot Topics and Annual Compliance Reporting Updates for Planning Your 2024 \(ONLINE\)](#)

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