

**RE: Proposed BACT For Continuous Dry Kilns in Region 10**

Hedgpeth, Zach (he/him/his) <Hedgpeth.Zach@epa.gov>

Tue 1/30/2024 9:22 AM

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

FYI – still looking further into this facility, but thought I'd share this screenshot with you.

The former Kattera facility in Spokane Valley is in the 3D area of google maps, see below. Good view of the hood and stack configuration at each end.

Mercer Mass Timber

19202 Garland Ave, Spokane Valley, WA 99027



Zach Hedgpeth, PE (he/him)  
206-553-1217

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

**Sent:** Tuesday, January 23, 2024 2:46 PM

**To:** Hedgpeth, Zach (he/him/his) <Hedgpeth.Zach@epa.gov>

**Subject:** Re: Proposed BACT For Continuous Dry Kilns in Region 10

**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hi, Zach. No problem. I uploaded the pertinent requested documents ORCAA has to the dropbox link provided.

I recently completed an initial draft of the permit but it has not gone through ORCAA's internal review process. I will pause the review on our end and consider any comments you may have after reviewing their BACT analysis, then resubmit for internal review.

When our internal review is complete we'll send a draft to Weyerhaeuser for their comments then submit a preliminary draft to the Washington State Department of Ecology for a Tier II review. If the draft passes the Tier II review, we will incorporate Ecology's recommendations into the permit and begin the 30-day public noticing period.

Let me know if you have any questions.

Sincerely,

Aaron Manley, P.E.

Engineer II

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**Olympic Region Clean Air Agency**

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[2940 Limited Lane NW](#)  
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**From:** Hedgpeth, Zach (he/him/his) <[Hedgpeth.Zach@epa.gov](mailto:Hedgpeth.Zach@epa.gov)>  
**Sent:** Tuesday, January 23, 2024 2:23 PM  
**To:** Aaron Manley <[aaron.manley@orcaa.org](mailto:aaron.manley@orcaa.org)>  
**Cc:** Meyer, Dan <[Meyer.Dan@epa.gov](mailto:Meyer.Dan@epa.gov)>; Glass, Geoffrey (he/him/his) <[GLASS.GEOFFREY@EPA.GOV](mailto:GLASS.GEOFFREY@EPA.GOV)>  
**Subject:** RE: Proposed BACT For Continuous Dry Kilns in Region 10

Hi Aaron,

Apologies, I am digging myself out on several projects after being out for the holidays. I took a quick look at these attachments, and it concerns me that almost all control technologies were eliminated as technically infeasible, apparently without any analysis. If possible, could you upload the full BACT analysis, along with all attachments and any calculations, to this OneDrive shared folder, linked  [here](#)?

I'd like to have the full BACT analysis to make sure I'm not missing something. It would also help if you could provide a short update on the project status.

Feel free to call as needed,

Zach Hedgpeth, PE (he/him)  
206-553-1217

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**From:** Aaron Manley <[aaron.manley@orcaa.org](mailto:aaron.manley@orcaa.org)>  
**Sent:** Thursday, December 28, 2023 11:05 AM  
**To:** Hedgpeth, Zach (he/him/his) <[Hedgpeth.Zach@epa.gov](mailto:Hedgpeth.Zach@epa.gov)>  
**Subject:** Fw: Proposed BACT For Continuous Dry Kilns in Region 10

**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hi, Zach. I hope all is well.

Did you have a chance to look at their proposed BACT for the CDK project, or forward to anyone at EPA who might be able to look at this? I understand staff are likely busy and I was just wondering if I might get any input before this project gets sent out for public commenting as getting input earlier in the process would be very helpful.

Feel free to let me know if you have questions or require additional information. Take care.

Sincerely,

Aaron Manley, P.E.

*Engineer II*

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**From:** Aaron Manley <[aaron.manley@orcaa.org](mailto:aaron.manley@orcaa.org)>  
**Sent:** Thursday, November 16, 2023 1:39 PM  
**To:** [hedgpeth.zach@epa.gov](mailto:hedgpeth.zach@epa.gov) <[hedgpeth.zach@epa.gov](mailto:hedgpeth.zach@epa.gov)>  
**Cc:** Meyer, Dan <[meyer.dan@epa.gov](mailto:meyer.dan@epa.gov)>; Cameron, Angela(Southern Design Services, Inc) <[Angela.Cameron@weyerhaeuser.com](mailto:Angela.Cameron@weyerhaeuser.com)>  
**Subject:** Proposed BACT For Continuous Dry Kilns in Region 10

Hello, Zach. Per our previous conversation, the Weyerhaeuser NR Company Raymond Facility (Weyerhaeuser) is proposing to install a 50 MMBtu/hr direct-fired continuous dry kiln (CDK) at

their existing lumber mill facility to replace a hog fuel boiler and dry kilns. We met today to discuss the permit application addendum (attached) in which they expanded on their BACT proposals. Note: the project does not trigger PSD and the BACT proposals are made with respect to minor NSR.

I mentioned on the call that EPA was interested in this project since it is a new source type in the area, and there is an elevated likelihood for EPA comments on the draft, especially with respect to BACT. I accordingly asked Weyerhaeuser staff if they were comfortable with me forwarding their BACT proposal to EPA, giving EPA a chance to review, and provide input earlier in the process if so inclined. Weyerhaeuser requested I forward their BACT proposal, hoping to be able to address any EPA input earlier in the process as opposed to later, if possible. Weyerhaeuser also suggested EPA Region 4 and 6 staff might have input, given their experience with this source category.

I'm therefore attaching a copy of the proposed BACT excerpt from the initial application (the full application is too large to attach in a single email) and the application addendum for EPA's consideration. Regardless of whether or not EPA chooses to provide input on the current BACT proposals, ORCAA will submit a copy of the proposed permit to EPA when the mandatory public commenting period commences.

Let me know if you have any questions, and I greatly appreciate any input on this project.

Sincerely,

Aaron Manley, P.E.

Engineer II

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