

RE: Weyerhaeuser Raymond CDK Health Impact Assessment

Beth Ryder <bRyder@trinityconsultants.com>

Tue 1/2/2024 9:31 PM

To: Palcisko, Gary (ECY) <gpal461@ECY.WA.GOV>; Aaron Manley <aaron.manley@orca.org>

Cc: Maddie Coates <Madison.Coates@trinityconsultants.com>; Friedman, Beth (ECY) <BEFR461@ECY.WA.GOV>; Nancy Liang <NLiang@trinityconsultants.com>

Gary,

Thank you for this follow up. We're internally reviewing how best to provide this information.

Best,

Beth

Beth Ryder

Principal Consultant

P 458.206.6770

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

Email: bryder@trinityconsultants.com

Upcoming Events:

[12/12/23 – EPA TSCA Rule Targets PFAS Consumer Goods Importers and Industrial Manufacturers with Retroactive Reporting Requirement \(ONLINE\)](#)

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

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

Sent: Friday, December 22, 2023 2:32 PM

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

Cc: Maddie Coates <Madison.Coates@trinityconsultants.com>; Friedman, Beth (ECY) <BEFR461@ECY.WA.GOV>

Subject: RE: Weyerhaeuser Raymond CDK Health Impact Assessment

Thanks Beth,

I spoke to my colleagues in the Air Quality Program regarding the use of a screening tool (such as Minnesota Pollution Control Agency's Risk Analysis Screening Spreadsheet) to inform a multipathway analysis for the CDK project. The general consensus was that **a refined multipathway analysis of arsenic exposures should be completed**. A multipathway analysis consistent with California OEHHA Hotspots Guidance or EPA guidance would be acceptable. We understand that there are existing Breeze software modules that could help with this type of analysis, unfortunately, I believe it requires re-running the dispersion model to include deposition.

In terms of the modeling that was already conducted (without deposition), we didn't identify any concerns. The inputs/outputs align with those described in the HIA document.

Let me know if you have any questions.

Gary Palcisko | Air Quality Program | Department of Ecology | Cell Phone #: 360-995-3447

From: Beth Ryder <bRyder@trinityconsultants.com>

Sent: Thursday, December 21, 2023 10:54 AM

To: Palcisko, Gary (ECY) <gpal461@ECY.WA.GOV>; Aaron Manley <aaron.manley@orcaa.org>

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

Subject: RE: Weyerhaeuser Raymond CDK Health Impact Assessment

Gary,

You noted in our call earlier that inorganic arsenic from wood combustion should be considered for multipathway screening. The report link below includes Arsenic in the review as detailed in Section 6. Below shows an excerpt from Section 6 with the arsenic added.

For arsenic, cadmium, lead, and nickel, exposure pathways are also via contact with contaminated water and soil and listed as pollutants that need to be considered for multi-pathway exposure. Based on the following screening methods, each pollutant is considered to have a low potential for multi-pathway risk and has not been further evaluated.

► *Arsenic, cadmium, and nickel – based on modeled concentrations and risk factors published in the Journal of the Air & Waste Management Association by the Minnesota Pollution Control Agency, all proposed non-inhalation pathways for cancer risk are below 0.1 and all non-inhalation pathways for non-cancer risk are below 1.*

Report (10 MB): <https://files.trinityconsultants.com/link/EMGiz5ONbFJIQObkBabxkM>

Minnesota Pollution Control Agency workbook with modeled concentrations entered in "Concs" tab for arsenic, cadmium, and nickel is attached showing non-inhalation pathways are below thresholds in the "Risk Calcs" tab.

Please let me know if you have any other questions.

Best,
Beth

Beth Ryder

Principal Consultant

P 458.206.6770

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

Email: bryder@trinityconsultants.com

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From: Beth Ryder

Sent: Thursday, December 7, 2023 2:38 PM

To: Palcisko, Gary (ECY) <gpal461@ECY.WA.GOV>; Aaron Manley <aaron.manley@orcaa.org>

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

<NLiang@trinityconsultants.com>

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Gary,

Links below include the final Health Impact Assessment for installation of the continuous direct fired kiln at Weyerhaeuser's Raymond facility. Please reach out with any questions or comments.

If you'd like we can set up a call to review the documents together. Let me know the most efficient path forward for Ecology, Weyerhaeuser is eager to get started on construction.

Report (9 MB): <https://files.trinityconsultants.com/link/xHZh7NsxiOTE1Y9E8EZCAC>

Soft Copy of Calculations (1.8 MB): <https://files.trinityconsultants.com/link/0LGcu1pPXzFjflIF3c4jCp>

Toxic Model Files (18.4 MB): <https://files.trinityconsultants.com/link/aQFqdNmXXVQ8onFxU7KbbV>

Thanks,
Beth

Beth Ryder

Principal Consultant

P 458.206.6770

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

Email: bryder@trinityconsultants.com



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