

Proposed BACT For Continuous Dry Kilns in Region 10

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To: hedgpeth.zach@epa.gov <hedgpeth.zach@epa.gov>

Cc: Meyer, Dan <meyer.dan@epa.gov>; Cameron, Angela (Southern Design Services, Inc) <Angela.Cameron@weyerhaeuser.com>

 2 attachments (8 MB)

2023-1115 Weyerhaeuser Raymond NOC Addendum.pdf; 23NOC1614-Application-8Sept2023 - BACT.pdf;

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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