



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

April 1, 2024

Aaron Manley  
Olympic Region Clean Air Agency  
2940 Limited Lane NW  
Olympia, WA 98502

**Re: Second Tier Review of Weyerhaeuser Inc. Continuous Dry Kiln Project –  
Raymond, WA**

Dear Aaron Manley:

The Washington Department of Ecology's Air Quality Program has completed a review of health risks from increased benzene, formaldehyde, and other toxic air pollutant emissions at Weyerhaeuser Inc. in Raymond, WA. We concluded that the health risk is acceptable and recommends approval of the project.

Weyerhaeuser proposes to replace eight existing indirect heated batch lumber dry kilns and a hog fuel boiler with a single direct-fired continuous dry kiln. The new kiln will be more efficient providing an ability to increase lumber drying capacity. These changes increase estimated emissions of benzene and formaldehyde that trigger second tier review under WAC 173-460-090. A second tier review requires the applicant to submit a health impact assessment describing the increased health risks from Weyerhaeuser's increased emissions of these toxic air pollutants.

Based on our review of the health impact assessment, increased benzene, formaldehyde, and other toxic air pollutants emissions result in a maximum increase lifetime cancer risk of about 9.6 in one million. The maximum increased risk is estimated for residents at a property east of Weyerhaeuser's property boundary. We also found that Weyerhaeuser's increased toxic air pollutant emissions will not likely contribute to long- or short-term health hazards in the community.

We recommend approval of the project because:

- We determined that the emission controls for the new and modified emission units represent best available control technology for toxics.
- The applicant demonstrated that the increase in emissions of toxic air pollutants is not likely to result in an increased cancer risk of more than one in one hundred thousand (10 in one million) which is the maximum risk allowed by a second tier review.
- We determined that the non-cancer hazard is acceptable.

Aaron Manley  
April 1, 2024  
Page 2

Because Weyerhaeuser offset toxic air pollutant emission increases under WAC 173-460-080, the existing batch lumber dry kilns and hog fuel boiler must be removed from service as a condition of approval.

This project has satisfied all requirements of second tier review under WAC 173-460-090. We recommend that you incorporate our findings as part of your ambient air impacts analysis and you may begin the public comment period when you are ready to do so.

If you would like to discuss this project further, please contact Gary Palcisko at 360-995-3447 or [gary.palcisko@ecy.wa.gov](mailto:gary.palcisko@ecy.wa.gov).

Sincerely,



Chris Hanlon-Meyer  
Science and Analysis Section Manager  
Air Quality Program

ch-m/tm

Enclosure

