



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 3, 2020

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

**Re: Second Tier Review of Sierra Pacific Industries Lumber Dry Kiln Redevelopment Project
– Aberdeen, WA**

Dear Aaron Manley:

The Washington Department of Ecology's Air Quality Program (Ecology) has completed a review of health risks from increased acetaldehyde and formaldehyde emissions at Sierra Pacific Industries (Sierra Pacific) in Aberdeen, WA. Ecology concluded that the health risk is acceptable and recommends approval of the project.

Sierra Pacific proposes to replace eight existing lumber dry kilns with eight new ones. These new kilns will be slightly larger and more efficient providing an ability to increase lumber drying capacity. Lumber drying capacity will increase from a current permit limit of 315 million board feet (MMbf/yr) to about 415 MMbf/yr. These changes result in an increase in estimated emissions of acetaldehyde 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 Sierra Pacific's emissions of these toxic air pollutants.

Based on Ecology's review of the health impact assessment, increased acetaldehyde and formaldehyde emissions results in a maximum increase lifetime cancer risk of about five in one million. The maximum increased risk is estimated for residents at a property east of Sierra Pacific. Ecology also found that Sierra Pacific's increased toxic air pollutant emissions will not likely contribute to long- or short-term health hazards in the community.

Ecology recommends approval of the project because:

- Ecology 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.

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- Ecology determined that the non-cancer hazard is acceptable.

This project has satisfied all requirements of second tier review under WAC 173-460-090. Ecology recommends 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.

A support document providing the basis for our recommendation will be sent in a forthcoming email. If you would like to discuss this project further, please contact Gary Palcisko at 360-995-3447 or gary.palcisko@ecy.wa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Hanlon-Meyer". The signature is written in a cursive, flowing style.

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