

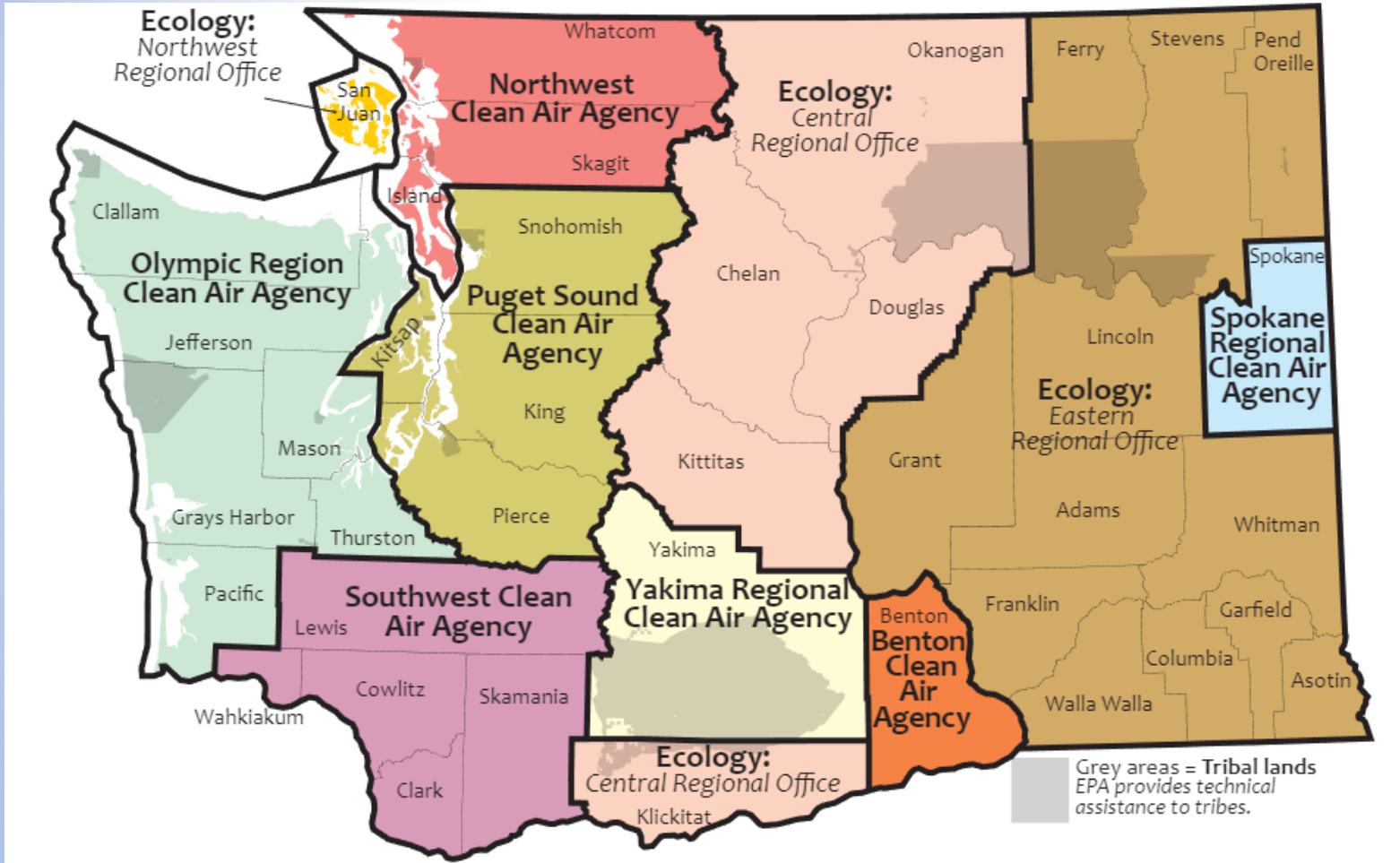
Olympic Region Clean Air Agency

Staff Presentation on Notice of Construction #23NOC1606

Pacific Northwest Renewable Energy, LLC
Proposed Wood Pellet Manufacturing Facility
Hoquiam, Washington

Public Hearing
January 16, 2024





Source: Washington State Dept. of Ecology website

Responsible for regulating air pollution sources in six counties

- New Source Review
- Air Operating Permits
- Inspections
- Enforcement
- Complaints





Terminology Overview

Potential to Emit (PTE) – The maximum capacity of a source to emit any air pollutant under its physical and operational design

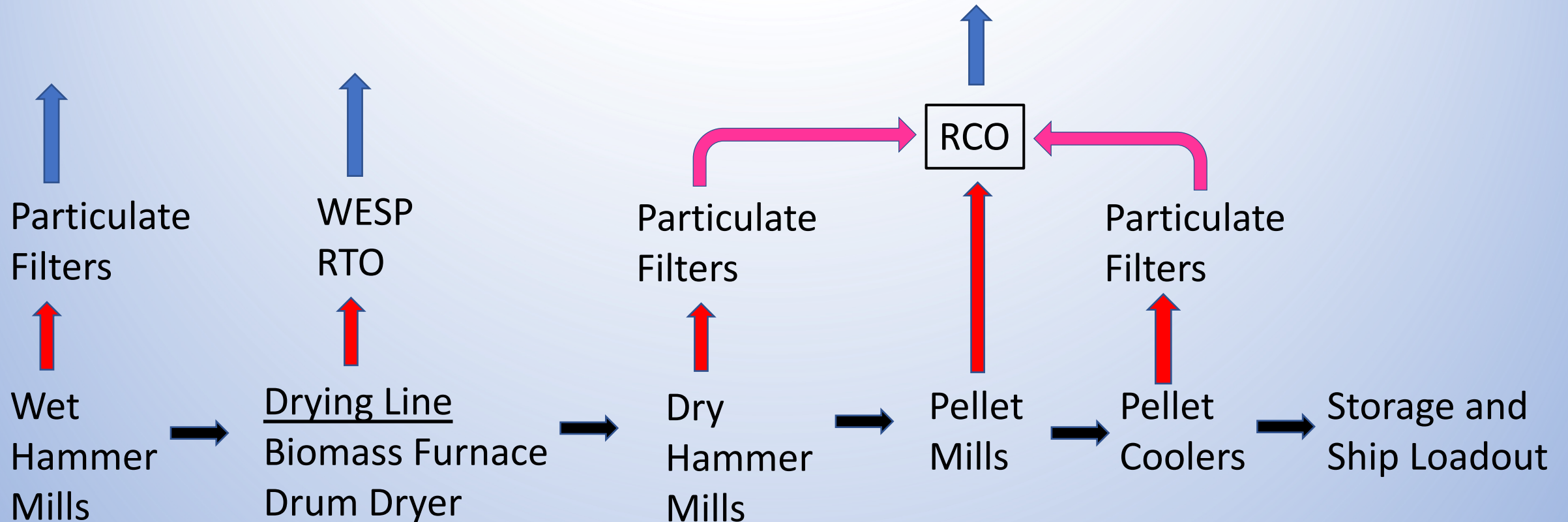
Stationary Source – Any building, structure, facility, or installation, which emits or may emit any air contaminant.



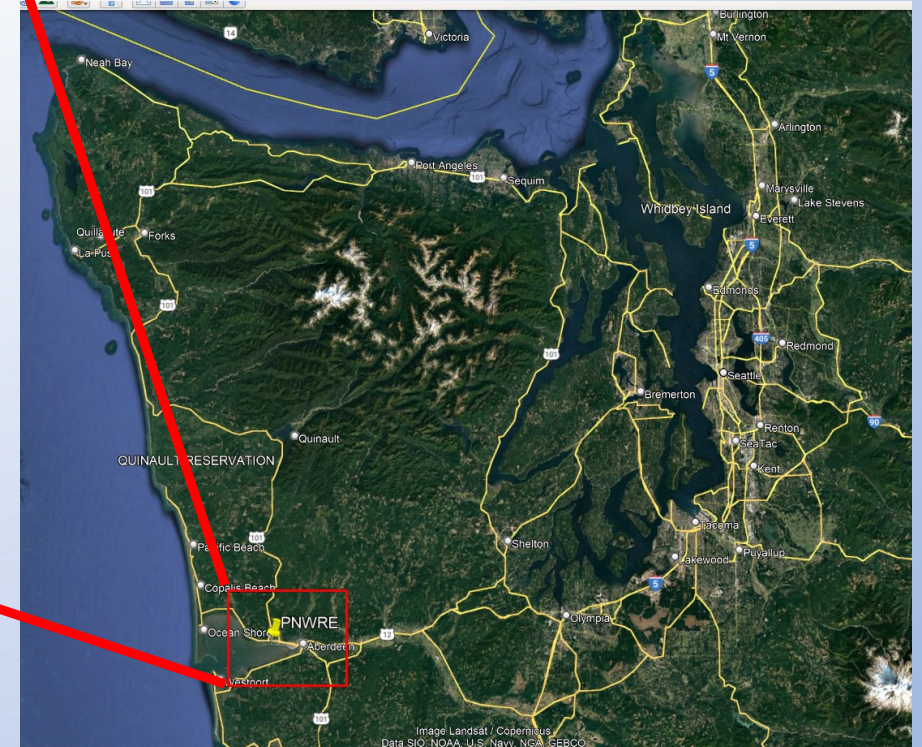
What is PNWRE Proposing?

Construct and operate a new wood pellet manufacturing facility

Designed to produce, store, and export up to 440,800 tons of wood pellets per year



Where will this facility be?



Criteria for Approval




- Performance Standards
- Best Available Control Technology (BACT)
- WA Air Toxics Regulation
- Prevention of Significant Deterioration (PSD) Air Permit
- Ambient Air Quality Standards

Criterion 1: Performance Standards

Where do I find this information for the PNWRE proposal?

- Section 9 (page 19) of the Preliminary Determination – Table 5

Title and Citation of Standard	Brief Description
<p><i>Emission Standards for Combustion and Incineration units</i></p> <p>WAC 173-400-050(1) ORCAA Rule 8.3(a)</p>	<p>Prohibits emissions from any combustion unit in excess of 0.1 gr/dscf.</p> <p>Applies to the furnace, RTO and RCO</p>
<p><i>Washington State Reporting of Emissions of Greenhouse Gases</i></p> <p>Chapter 173-441 WAC</p>	<p>Establishes mandatory GHG reporting requirements. Implemented by the WA State Dept. of Ecology</p> 

Criterion 2: Best Available Control Technology (BACT)

Where do I find this information for the PNWRE proposal?

- Section 10 (Page 25) of the Preliminary Determination



Applies to new stationary sources of air pollution



Emission Limits



Maximum Degree of Reduction



Case-by-Case Basis

Emission Source	Pollution Control Technology & Methods	BACT Emissions Limit
Drying Line (furnace, drum dryer)	Cyclones, Wet ESP, RTO	8.0 lbs PM-10*/hr 53 lbs NOx/hr 42 lbs CO/hr 7 lbs VOC/hr 0.028 lbs HCl/hr 0.0006 lbs Hg/hr 5% opacity



* filterable + condensable

Criterion 3: WA Air Toxics Regulation

Where do I find this information for the PNWRE proposal?

- Section 12, page 27 of the Preliminary Determination

The Air Toxics Rule includes two independent requirements:

- **tBACT:** Must use Best Available Control Technology to control TAP emissions
- **Ambient Impact:** any increase in TAP must be sufficiently low to protect human health and safety

Toxic Air Pollutant	Acceptable Threshold*	Maximum Projected Impact
Benzene	0.13 $\mu\text{g}/\text{m}^3$	0.01 $\mu\text{g}/\text{m}^3$
Mercury	0.03 $\mu\text{g}/\text{m}^3$	0.0005 $\mu\text{g}/\text{m}^3$

*Established by WA State Dept of Ecology



Criterion 4: Prevention of Significant Deterioration (PSD) Implications

Where do I find this information for the PNWRE proposal?

- Section 13, page 30 of the Preliminary Determination
- The facility-wide potential to emit is summarized in Table 2, page 15 of the preliminary determination



If the proposal is subject to the PSD program, all permitting requirements under that program must be met.



ORCAA staff's conclusions is that the proposed pellet manufacturing facility is not subject to the PSD program



Criterion 5: Ambient Air Quality Standards

Where do I find this information for the PNWRE proposal?

- Section 11, Page 27 of the Preliminary Determination



Based on maximum potential to emit for all pollutants



Analyses accomplished by utilizing refined air pollution dispersion computer models that account for meteorology and terrain



ORCAA Staff's conclusion after reviewing PNWRE's analyses is that the proposed pellet mill will not cause or contribute to a violation of any National Ambient Air Quality Standard (NAAQS)



Summary and Staff Recommendation

- Conditional approval of the proposal
- Includes emissions and operating standards, monitoring, recordkeeping and reporting

Where do I find this information for the PNWRE proposal?

- Section 16, Page 33 of the Preliminary Determination

What's Next?



Comment Deadline: 4:30 p.m. January 18th, 2024



ORCAA Staff considers and responds to all comments received. Responses to comments are sent to those who sign up on the mailing list or provided comments



ORCAA makes a Final Determination to conditionally approve or deny the application*

*Permit Appeal: Anyone may appeal the Approval Order to the Washington State Pollution Control Hearings Board (PCHB) within 30 days from issuance of the Final Determination. The appeal must be filed with the PCHB and a copy provided to ORCAA.

Documents related to the PNWRE application can be found here:

<https://www.orcaa.org/notices/notice-of-construction-pacific-northwest-renewable-energy-2/>

