

From: [Wood-Siglin, Nancy](#)
To: [Holbrook, Kelsey \(ECY\)](#)
Cc: [Hamilton, Brian](#); [Carter, Jack](#); [Ashley Jones](#)
Subject: RE: Weyerhaeuser Longview Sort Yard debarker and bins NOC
Date: Tuesday, October 09, 2018 6:42:31 AM

Hi Kelsey,

Thank you for researching options for replacing the debarker unit at Longview. Unfortunately the debarker unit is pretty much obsolete and replacement of a like kind will not be an available option. We are experiencing a shortage of replacement parts as well. That is why we are seeking to replace the unit which has had a catastrophic failure.

Would it be comparable to "like kind" if we installed the proposed unit with a mechanical restriction of the run-rate capacity? After the NOC is reviewed with an approved order issued we remove the restriction device? The proposed project in the submitted NOC doesn't include a planned increase in production rates with the newer debarker. Our project is focused on updating the equipment to a unit that can be serviced.

If there is any assistance we might be able to provide please contact me. Ashley Jones with Trinity Consultants prepared the NOC and could be a resource as well.

Ashley Jones
253-867-5600 ext.1005
AVJones@trinityconsultants.com

Thanks,

Nancy Wood Siglin
Environmental Manager
360-942-6305 Raymond Office
360-355-3764 Longview Office
360-581-7824 Cell

From: Holbrook, Kelsey (ECY) <keho461@ecy.wa.gov>
Sent: Monday, October 08, 2018 4:11 PM
To: Wood-Siglin, Nancy <Nancy.Wood-Siglin2@weyerhaeuser.com>
Cc: Hamilton, Brian <Brian.Hamilton@weyerhaeuser.com>; Carter, Jack <Jack.Carter@weyerhaeuser.com>
Subject: RE: Weyerhaeuser Longview Sort Yard debarker and bins NOC

Hi Nancy,

This is a follow-up to our phone conversation earlier today. I talked with my supervisor and a few permit writer's in other regions about the situation with the debarker. I think the only option is to

wait for the NOC to be issued or to replace the debarker with an 'identical' unit. This would mean it would have to be pretty much the same design and not have the larger capacity that Weyerhaeuser was planning to install. I don't know if you'd have an option to rent an 'identical' unit until the NOC goes through. I'm going to try and get the NOC out as soon as possible, but as I said earlier, this is my first NOC and I'm not sure what hiccups may come up along the way.

Let me know if you have any questions or if you'd like to discuss further.

Thanks,
Kelsey

From: Wood-Siglin, Nancy [<mailto:Nancy.Wood-Siglin2@weyerhaeuser.com>]
Sent: Monday, October 8, 2018 10:51 AM
To: Holbrook, Kelsey (ECY) <keho461@ecy.wa.gov>
Cc: Hamilton, Brian <Brian.Hamilton@weyerhaeuser.com>; Carter, Jack <Jack.Carter@weyerhaeuser.com>; Wess Safford <Wess@swcleanair.org>
Subject: RE: Weyerhaeuser Longview Sort Yard debarker and bins NOC

Hi Kelsey,
Thanks for getting back to us on the timeline. Are there any opportunities to reduce the time needed so we can complete the project this year?

Nancy Wood Siglin
Environmental Manager
360-942-6305 Raymond Office
360-355-3764 Longview Office
360-581-7824 Cell

From: Holbrook, Kelsey (ECY) <keho461@ecy.wa.gov>
Sent: Monday, October 08, 2018 10:45 AM
To: Wood-Siglin, Nancy <Nancy.Wood-Siglin2@weyerhaeuser.com>
Cc: Hamilton, Brian <Brian.Hamilton@weyerhaeuser.com>; Carter, Jack <Jack.Carter@weyerhaeuser.com>; Wess Safford <Wess@swcleanair.org>
Subject: RE: Weyerhaeuser Longview Sort Yard debarker and bins NOC

Hi Nancy,

The approximate timeline is 4 to 6 months. This is my first NOC so I'm basing this off of my coworker's experiences. We received the hard copy last Tuesday (Oct 2). I have started my review of the application for the completeness determination. I'm hoping to have that completed within the next week or so.

Thanks,

Kelsey Holbrook

Environmental Engineer
Industrial Section, Solid Waste Management Program
Washington Department of Ecology
Phone: (360) 407-6355
Fax: (360) 407-6102

From: Wood-Siglin, Nancy [<mailto:Nancy.Wood-Siglin2@weyerhaeuser.com>]
Sent: Friday, September 28, 2018 9:51 AM
To: Holbrook, Kelsey (ECY) <keho461@ecy.wa.gov>; Wess Safford <Wess@swcleanair.org>
Cc: Hamilton, Brian <Brian.Hamilton@weyerhaeuser.com>; Carter, Jack <Jack.Carter@weyerhaeuser.com>
Subject: Weyerhaeuser Longview Sort Yard debarker and bins NOC

Hi Kelsey,

Attached is the Notice of construction application and SEPA checklist for the debarker and bark bins replacement at the Longview Sort Yard. A paper copy with a check for the required fees has been sent via certified mail. Could you please give us a timeline for the approval process?

Wess we provided you a curtesy copy for your records.

If you would like the SEPA checklist in MS Word format or need additional information please contact me.

Thanks,

Nancy Wood Siglin
Environmental Manager
360-942-6305 Raymond Office
360-355-3764 Longview Office
360-581-7824 Cell

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From: [Wood-Siglin, Nancy](#)
To: [Holbrook, Kelsey \(ECY\)](#)
Cc: [Carter, Jack](#); [Wess Safford](#); [Hamilton, Brian](#)
Subject: RE: Debarker SEPA Checklist Review
Date: Wednesday, October 17, 2018 8:18:25 AM

Hi Kelsey,
Please see response comments below for the debarker/bins SEPA checklist.
Best phone number to contact me today is 360-942-6305 or 360-581-7824.
Thanks,

Nancy Wood Siglin
Environmental Manager
360-942-6305 Raymond Office
360-355-3764 Longview Office
360-581-7824 Cell

From: Holbrook, Kelsey (ECY) <keho461@ecy.wa.gov>
Sent: Tuesday, October 16, 2018 3:16 PM
To: Wood-Siglin, Nancy <Nancy.Wood-Siglin2@weyerhaeuser.com>
Cc: Carter, Jack <Jack.Carter@weyerhaeuser.com>; Wess Safford <Wess@swcleanair.org>
Subject: Debarker SEPA Checklist Review

Hi Nancy,

I had a few follow-up questions/comments on the SEPA checklist which was submitted with the NOC application for the debarker replacement.

1. Could you provide more information on the increased energy use associated with this project? Based on the increased throughput of the debarker replacement I'm assuming there will be a higher energy demand. **We are replacing the old DC electrical system with an updated AC electrical system with a variable drive controller – our expectation is that we will have decreased energy usage.**
2. Will runoff from this area be collected in the stormwater system or will it flow to the process wastewater system? Could you provide more information on the increased discharge from the watering of the logs prior to debarking? **Runoff from this area goes to outfall 003 and no increase in runoff is expected. The current practice is to "sprinkle" the logs. The water generally absorbs into the bark and is transferred to the bark material bins.**
3. Is there an anticipated increase in water usage due to the project? **No increase in water use is expected because there is not a planned increase in production throughput.**

Please let me know if you have any questions or if you'd like to discuss further.

Thanks,

Kelsey Holbrook

Environmental Engineer

Industrial Section, Solid Waste Management Program

Washington Department of Ecology

Phone: (360) 407-6355

Fax: (360) 407-6102

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From: [Wess Safford](#)
To: [Holbrook, Kelsey \(ECY\)](#)
Subject: RE: Weyerhaeuser Longview Sort Yard debarker and bins NOC
Date: Wednesday, October 17, 2018 10:53:56 AM

Kelsey -

SWCAA has a number of facilities with debark decks and wood waste shipping bins. Some of the facilities are hard wood mills and some are softwood stud mills. SWCAA tends to be tighter on visible emission limits than Ecology so the opacity limits are probably lower than you have seen in other Ecology permits. Our typical emission control requirements for new equipment would be as follows:

Debarker - New debarkers must install process enclosures and utilize shrouded or enclosed waste material collection/conveyance equipment. Opacity limit of 0%. If properly equipped, emissions from debarking are often considered negligible.

Bark/Chip Bins - The loading area under large particle loadout bins must be equipped with full length sidewalls (wind barrier) and shrouding/curtains at the ends of the loading area to reduce fugitive particulate matter emissions. Opacity limit of 0-5% opacity. SWCAA has district specific emission factors for material loadout.

Sander Dust Bins - The loading area under sander dust loadout bins must be fully enclosed and vented to a powered collection unit during active transfer operations. Opacity limit of 10-20%. SWCAA has district specific emission factors for dust loadout.

Regarding the BACT measures described on page 4 of the NOC application, Weyerhaeuser's proposed use of water sprays and a dust control plan would be acceptable for the debarker. I am not familiar with the facility's fugitive dust control plan so I can't say if it would meet the Agency's requirements for the loadout bins.

If you have any questions, give me a call.

- Wess

*Wess Safford, AQ Engineer
Southwest Clean Air Agency
(360) 574-3058, x126
wess@swcleanair.org*

From: Holbrook, Kelsey (ECY) <keho461@ecy.wa.gov>
Sent: Wednesday, October 10, 2018 10:37 AM
To: Wess Safford <Wess@swcleanair.org>
Subject: FW: Weyerhaeuser Longview Sort Yard debarker and bins NOC

Hi Wess,

I'm working on reviewing the application and wanted to check in with you. Does SWCAA have any other lumber mills with debarkers and/or bark bins? Page 4 of their NOC application includes their BACT analysis for the project. I wanted to be sure this didn't conflict with previous BACT determinations at lumber mills for SWCAA. Let me know if you have any other comments or questions on the application.

Thanks!

Kelsey

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From: [Wood-Siglin, Nancy](#)
To: [Ashley Jones](#); [Holbrook, Kelsey \(ECY\)](#)
Subject: FW: Debarker NOC Application - Follow-up Questions
Date: Friday, October 19, 2018 6:59:20 AM
Attachments: [4934 order cover letter with BACT.pdf](#)

Hi Kelsey and Ashley,

Brian received a verbal confirmation on the specific run rate of the replacement debarker is 120 feet/minute at optimal conditions such as straight logs, minimal knots, no swell, perfect timing on infeed deck. Most likely the debarker actual run rate could be around 90-100 feet/minutes. We are working with Nicholson to provide an email confirmation or other documentation.

Kelsey would you be able to finish the completeness determination and submit to your public notice personnel based on the verbal confirmation while we work on the written documentation? Brian was pushing to have the documentation today.

Thanks,
Nancy

From: Wood-Siglin, Nancy
Sent: Thursday, October 18, 2018 12:11 PM
To: 'Ashley Jones' <AVJones@trinityconsultants.com>; Holbrook, Kelsey (ECY) <keho461@ecy.wa.gov>
Subject: RE: Debarker NOC Application - Follow-up Questions

Hi Kelsey and Ashley,

Below are snips from SWCCA's working copy draft permit. The first is the requirement section and the second snip is from the monitoring section. I also attached the BACT determination for the "shrouds or walls". I'm working with Brian to acquire the demonstration of maximum capacity.

Let me know if you have any questions.
Nancy

Reqs 24-25

Sawmill - Wood Residual Bins

Order 4372 Amendment 1

Reqs 24-25 incorporate New Source Review BACT requirements to control fugitive emissions from operation of the wood residual bin loadout stations and associated truck traffic. Compliance is assured through maintenance and operating records.

Sawmill – Wood Residual Bins

M8. Operations Monitoring

Reqs 24, 25

This monitoring section is drawn from Order 4372 Amendment 1. The permittee is required to record maintenance activities for the residual bins and wind shrouds and maintain a log of wet suppression use in gravel areas associated with the residual bin loadout stations. These measures confirm ongoing use of best practices to minimize fugitive emissions.

From: Ashley Jones <AVJones@trinityconsultants.com>
Sent: Wednesday, October 17, 2018 4:57 PM
To: Holbrook, Kelsey (ECY) <keho461@ecy.wa.gov>
Cc: Wood-Siglin, Nancy <Nancy.Wood-Siglin2@weyerhaeuser.com>
Subject: RE: Debarker NOC Application - Follow-up Questions

Any of those times work for me. Nancy – let us know what works for you and I can send out a meeting invite and call-in number.

Thanks,
Ashley
253-867-5600 ext.1005

From: Holbrook, Kelsey (ECY) [<mailto:keho461@ecy.wa.gov>]
Sent: Wednesday, October 17, 2018 5:42 PM
To: Ashley Jones <AVJones@trinityconsultants.com>
Cc: Wood-Siglin, Nancy <Nancy.Wood-Siglin2@weyerhaeuser.com>
Subject: RE: Debarker NOC Application - Follow-up Questions

Thanks for the information, Ashley.

I think a call would be beneficial. Nancy, I don't know if you'd like to sit in on the call also and we can go over some updated timelines.

I'm available tomorrow morning after 9:30 AM until noon. I'm also available tomorrow afternoon after 1:30 PM. Let me know if any of those times work for you both.

Thanks,
Kelsey

From: Ashley Jones [<mailto:AVJones@trinityconsultants.com>]
Sent: Wednesday, October 17, 2018 3:22 PM
To: Holbrook, Kelsey (ECY) <keho461@ecy.wa.gov>
Cc: Wood-Siglin, Nancy <Nancy.Wood-Siglin2@weyerhaeuser.com>; Carter, Jack <Jack.Carter@weyerhaeuser.com>; Wess Safford <Wess@swcleanair.org>; Hamilton, Brian <Brian.Hamilton@weyerhaeuser.com>
Subject: FW: Debarker NOC Application - Follow-up Questions

Hi Kelsey,

Thank you for the emails. We have been working to verify information to ensure a correct and appropriate response, so I apologize for the delay. I am providing the information that we can confirm and provide now, and can provide updates as needed.

I have provided responses in red font to both emails below.

It may also be helpful to have a call to discuss. Please feel free to reach out or let me know when would be a good time to call.

Thanks,
Ashley
253-867-5600 ext.1005

From: Holbrook, Kelsey (ECY) [<mailto:keho461@ecy.wa.gov>]
Sent: Wednesday, October 17, 2018 2:50 PM
To: Wood-Siglin, Nancy <Nancy.Wood-Siglin2@weyerhaeuser.com>; Ashley Jones <AVJones@trinityconsultants.com>
Cc: Carter, Jack <Jack.Carter@weyerhaeuser.com>; Wess Safford <Wess@swcleanair.org>
Subject: RE: Debarker NOC Application - Follow-up Questions

Hi Ashley and Nancy,

Another comment to follow-up on with the application. The application states that BACT for the debarker will be watering the logs. The application also says that BACT for the conveyors and the bark bins is the implementation of the fugitive dust control plan. Could you include more information on the BACT analysis that was completed? Specifically whether enclosures on the debarker and the bark bin were analyzed. Looking through the RACT/BACT/LAER Clearinghouse it looks like they had a couple of debarkers that were enclosed. Also SWCAA has a few debarkers at sources in their jurisdiction that are also enclosed.

Let me know if you'd like to discuss further.

Response:

The current large debarker ring itself is enclosed for safety reasons with the added benefit of reduced fugitive material from being spread. The entire apparatus has a roof overhead, and there is a wall sheeting along one side, but it is not fully enclosed on all sides due to structure limitations. The roof and wall sheeting also help to reduce fugitive emissions. Weyerhaeuser will maintain these existing structures for the new replacement large debarker, but it will not be fully enclosed. The current bark bin is enclosed and the new bark bin will also be enclosed.

In reviewing the RBLC database most of the search options do not return valid results, except for one summarized below, which are likely the same results you identified. Both of these RBLC entries are for SIP and PSD BACT analyses. The processes are also significantly larger than the Weyerhaeuser process. Keep in mind that the project emissions are barely over the NOC permitting thresholds. Since the debarking ring has several operational practices that reduce emissions (water spray and partial enclosures) and the bark bin is enclosed, I would not expect that it would be economically

and potentially not technically feasible to install further enclosures on the large debarking unit. Please let us know if you would like to discuss further.

RBLC Search:

Process Type 30.999 – Other Wood Products Industry Sources. Process type including “bark”, Pollutant set at PM:

1. **Resolute FP US Inc. Catawba Lumber Mill (RBLC ID SC-0181) – Enclosure of debarking operations and proper maintenance and good operating practices. (0.01 lb/ton) for SIP and PSD BACT requirements. 312.5 MMBdft, approximately twice the capacity of the Weyerhaeuser unit.**
2. **Union County Lumber Company (RBLC ID AR-0124) – El Dorado Sawmill – Hood enclosure on debarker unit. 95% control (0.02 lb/ton). PSD BACT determination. Union County Lumber Company is over 5.5 times the throughput of Weyerhaeuser (i.e. Weyerhaeuser is only 18% of the throughput).**

Thanks,
Kelsey

From: Holbrook, Kelsey (ECY)

Sent: Tuesday, October 16, 2018 3:09 PM

To: Wood-Siglin, Nancy <Nancy.Wood-Siglin2@weyerhaeuser.com>; Ashley Jones <AVJones@trinityconsultants.com>

Cc: Carter, Jack <Jack.Carter@weyerhaeuser.com>; 'Wess Safford' <Wess@swcleanair.org>

Subject: Debarker NOC Application - Follow-up Questions

Hi Nancy and Ashley,

Good talking with you both today. As I mentioned on the phone, I have a few follow-up questions/comment after going through the application.

1. The application states that the replacement debarker will be capable of operating at 150 lineal feet per minute. The product information which was included with the application shows a range of debarkers with various feed speeds. None of the listed debarkers have a feed speed of 150 lineal feet per minute. Please provide more information on the specifications for the proposed replacement debarker.

Response: The product information was generalized and not for the specific unit. We are trying to locate the unit specific specification sheet or a way to demonstrate the capacity of 150 lineal feet per minute, which was the advertised capacity provided to Weyerhaeuser from the 3rd party seller.

2. The actual potential to emit was calculated based on the potential annual throughput. Please provide more information on how the potential annual throughput was calculated. Additionally, could you please provide the full PTE for the debarker and double bark bin? While the minor NSR applicability determination is based on the actual PTE, the full PTE would

be beneficial information to have.

Response: The basis for the potential annual throughput was based on information from plant personnel. 135 MMbdft/yr is the facility's entire projected volume from both debarker rings, assuming on a worst case basis that all of the throughput has to be processed in the large debarker ring that is being replaced and the subject of this NOC. A 20% safety factor was also included. This equates to 162 MMbdft/yr. This was described in the Barker Throughput section of the Emissions Calculations in the NOC application write-up.

The full potential to emit would be based on 150 lineal feet per minute, average of 40" logs, 24/7 operation, unless there is a bottle neck elsewhere that would reduce this number. If there are no bottlenecks, 8256 MMbdft would be the full PTE. This increases emissions significantly and are not realistic. Can we discuss this further prior to going down the path of determining potential bottlenecks and emissions that would artificially overstate emissions?

3. There is little discussion on the change in emissions due to the double bark bin versus the single bark bin. Could you provide more information on this?

Response: There is little information on the existing bin since it is an insignificant activity, but the change in the emissions would be relative to the change in potential throughput. No annual throughput increase is anticipated, so no change in emissions is anticipated on an annual basis. On a short term basis, it would be the same increase from 746 tons per hour (75 lineal feet) to 1492 tons per hour (150 lineal feet), so double.

Please let me know if you have any questions or comments.

Thank you,

Kelsey Holbrook
Environmental Engineer
Industrial Section, Solid Waste Management Program
Washington Department of Ecology
Phone: (360) 407-6355
Fax: (360) 407-6102

4372



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

March 27th, 2008

CERTIFIED MAIL
7006 2760 0000 0402 7951

Greg Bean
Weyerhaeuser Company
PO Box 188
Longview, Washington 98632

Re: Air Order No. 4372, New Sawmill

Dear Mr. Bean:

Enclosed is Order No. 4372. This order is being issued in accordance with RCW 70.94 and WAC 173-400-110 for your facility's proposed new sawmill and air pollution controls.

If you have any questions concerning the content of this document, please call or write Marc Crooks, at telephone/address (360) 407-6934, Department of Ecology, PO Box 47600, Olympia, WA 98504-7600.

Per WAC 173-400-250, Order/Permit Appeal Provision, any person can file an appeal with the Pollution Control Hearings Board pursuant to Chapter 43.21 RCW and Chapter 371-08 WAC. Information regarding the Appeal process, and Application for Relief, is in the penalty order.

Sincerely,

A handwritten signature in blue ink that reads "Carol Kraege".

Carol Kraege
Industrial Section Manager

enclosure



DEPARTMENT OF ECOLOGY

NOTICE OF CONSTRUCTION)
APPROVAL ORDER FOR:)
WEYERHAEUSER COMPANY)
LONGVIEW PULP MILL

ORDER No. 4372

To: Weyerhaeuser Longview
PO Box 188
Longview, Washington 98632

This is a Notice of Construction Approval Order issued in accordance with RCW 70.94.152 and WAC 173-400-110. A Notice of Construction Application (NOC) was received electronically on April 21, 2007 and was determined to be complete and an Ecology approval sent electronically on May 3, 2007.

The proposed project will install a new sawmill at Weyerhaeuser's Longview, Washington, Complex. Production at the new sawmill will feed the existing planers and kilns at the Longview site.

The new sawmill will include the following emission units:

- Saw filing & maintenance shop;
- Trimmer saw;
- Residual collection systems for chips and shavings.

The projected actual operating rate of the new sawmill is 500 million board feet (MMbf) per year. The maximum production capacity of the new sawmill will be approximately 550 MMbf per year. The Lumber from the sawmill will be transferred to the planer mill at the Longview Complex and planed lumber may either be shipped green or dried in the existing onsite dry kilns. The existing planer lines and dry kilns will not be modified by this project. Planer mill production is expected to increase as a result of the project, but dry kiln production will not be affected by the project.

Based on the complete NOC application and a technical analysis, Ecology makes the following determinations regarding the project if constructed and operated as required in this order:

1. The project will meet all applicable federal and state rules and regulations including: General Regulations for Air Pollution Sources, Chapter 173-400 WAC, and Controls for New Sources of Toxic Air Pollutants, Chapter 173-460 WAC.
2. The project will use Best Available Control Technology (BACT). Ecology's review has found that:
 - Southwest Clean Air Agency (SWCAA) established 0.005 gr/dscf as BACT for a dust filtration system installed at Weyerhaeuser's Green Mountain Sawmill in 1996.

- SWCAA approved BACT for trimmer operations at the Centralia Sawmill in 2006 as building enclosure and pneumatic collection with a baghouse.
 - Ecology in a PSD determination approved BACT for dust collection at a planer mill at the Sierra Pacific Mount Vernon in 2005 as a baghouse.
3. The emissions from the modified source will not cause or contribute to a violation of any ambient air quality standard.

Approval Conditions

THEREFORE, IT IS ORDERED that the project, as described in said Notice of Construction Application, is approved provided the following conditions are met:

The project is completed as described in the submitted Notice of Construction.

BACT for the dust collection system at the Longview sawmill is defined as control in a baghouse with emissions not to exceed 0.005 gr/dscf. Compliance is to be demonstrated by keeping inspection and maintenance records for the baghouse. A source test is required for the sawmill baghouse after start-up to confirm that the sawmill's emission control system achieves this emission standard.

Ecology's review of BACT for dust control from bin loadout found that SWCAA approved BACT for bin loadout at the Centralia Sawmill permitted in 2006 was two-sided wind shrouds (sidewalls extending from the bottom of the bin to the container being loaded) and best management practices. For Weyerhaeuser's Longview facility, Ecology has determined that BACT will similarly be defined as two-sided wind shrouds or walls with compliance to be demonstrated by keeping maintenance records for the shrouds or walls.

BACT for dust control from mobile sources on a gravel surface will be defined as watering with compliance to be demonstrated by keeping log sheets for the watering.

As required by WAC 173-400-720 (4)(b)(iii)(C)(iv), an annual report summarizing emissions information is required within 60 days after the end of the calendar year following resumption of regular operation after the improvements have been completed.

Failure to comply with this Order may result in the issuance of civil penalties or other actions, whether administrative or judicial, to enforce the terms of this Order.

Nothing in this order shall be construed to relieve the Weyerhaeuser Company of its obligations under any applicable state, local, or federal laws or regulations.

This order may be modified, suspended or revoked in whole or part for cause including, but not limited to, the following:

1. Violation of any terms and conditions of this order.
2. Misrepresentation or failure to disclose fully all relevant facts in the Notice of Construction Application.

This Order shall become invalid if construction is not commenced within 18 months after receipt of final approval, if construction is discontinued for a period of 12 months or more, or if construction is not complete within 48 months. Ecology may extend the construction period upon a satisfactory showing that an extension is justified.

The provisions of this order are severable and, if any provision of this authorization, or application of any provision of this authorization to any circumstances, is held invalid, the application of such provision to their circumstances and the remainder of this authorization shall not be affected thereby.

Appeal Process

This Order may be appealed. Your appeal must be filed with the Washington Pollution Control Hearings Board (PCHB) within 30 days of receipt of this Order.

The notice of appeal, to the PCHB, shall include, as attachments, a copy of this NOC Approval order, a copy of the NOC application, and any additional information submitted to Ecology in support of the application. At the same time, a copy of the notice of appeal, without attachments, must be served on the Department of Ecology. In addition please send a copy of the appeal directly to the Industrial Section. The addresses are listed below.

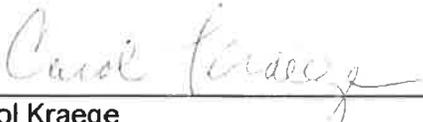
The Pollution Control Hearings Board
4224 6th Avenue SE, Rowe Six, Bldg 2
P.O. Box 40903
Olympia, Washington 98504-0903

The Department of Ecology
Appeals Coordinator
P.O. Box 47608
Olympia, Washington 98504-7608

Merley F. McCall
Ecology
Industrial Section Manager
P.O. Box 47706
Olympia, Washington 98504-7600

Your appeal alone will not stay the effectiveness of this Order. Stay requests must be submitted in accordance with RCW 43.21B.320. These procedures are consistent with the provisions of Chapter 43.21B RCW.

DATED this 27th day of March, 2008 at Olympia, Washington



Carol Kraege
Industrial Section Manager

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From: [Wood-Siglin, Nancy](#)
To: [Holbrook, Kelsey \(ECY\)](#)
Cc: [Ashley Jones](#)
Subject: RE: Debarker NOC Application - Follow-up Questions
Date: Friday, October 19, 2018 1:28:48 PM
Attachments: [FW Weyco Longview 50 A2 speeds.msg](#)

Hi Kelsey and Ashley,

The attached email contains the manufactured run rate and other design features for the Nicholson Debarker Longview wants to install. Nick Thiemer of Nicholson Manufacturing gathered the data from their manufacturing records. Will this fulfill the necessary documentation record for the completeness determination?

Thanks,

Nancy Wood Siglin
Environmental Manager
360-942-6305 Raymond Office
360-355-3764 Longview Office
360-581-7824 Cell

From: Holbrook, Kelsey (ECY) <keho461@ecy.wa.gov>
Sent: Friday, October 19, 2018 11:42 AM
To: Wood-Siglin, Nancy <Nancy.Wood-Siglin2@weyerhaeuser.com>
Cc: Ashley Jones <AVJones@trinityconsultants.com>
Subject: RE: Debarker NOC Application - Follow-up Questions

Hi Nancy,

I have sent the completeness determination (and the SEPA determination) on to Stephanie for her review. If she has any comments on either I'll need to address those. After that I can send it on to our public outreach coordinator for her to start drafting the notice. I'd like to have the documentation of the run rate capacity before issuing the completeness determination, but our outreach coordinator can work on her piece while I'm waiting for that.

Thanks,
Kelsey

From: Wood-Siglin, Nancy [<mailto:Nancy.Wood-Siglin2@weyerhaeuser.com>]
Sent: Friday, October 19, 2018 11:35 AM
To: Holbrook, Kelsey (ECY) <keho461@ecy.wa.gov>; Ashley Jones <AVJones@trinityconsultants.com>
Subject: FW: Debarker NOC Application - Follow-up Questions

Just wanted to check in and make sure you received this email.

Thanks,

Nancy

From: Wood-Siglin, Nancy
Sent: Friday, October 19, 2018 6:59 AM
To: 'Ashley Jones' <AVJones@trinityconsultants.com>; Kelsey Holbrook
(kelsey.holbrook@ecy.wa.gov) <kelsey.holbrook@ecy.wa.gov>
Subject: FW: Debarker NOC Application - Follow-up Questions

Hi Kelsey and Ashley,
Brian received a verbal confirmation on the specific run rate of the replacement debarker is 120 feet/minute at optimal conditions such as straight logs, minimal knots, no swell, perfect timing on infeed deck. Most likely the debarker actual run rate could be around 90-100 feet/minutes. We are working with Nicholson to provide an email confirmation or other documentation.

Kelsey would you be able to finish the completeness determination and submit to your public notice personnel based on the verbal confirmation while we work on the written documentation? Brian was pushing to have the documentation today.

Thanks,
Nancy

From: Wood-Siglin, Nancy
Sent: Thursday, October 18, 2018 12:11 PM
To: 'Ashley Jones' <AVJones@trinityconsultants.com>; Holbrook, Kelsey (ECY)
<keho461@ecy.wa.gov>
Subject: RE: Debarker NOC Application - Follow-up Questions

Hi Kelsey and Ashley,

Below are snips from SWCCA's working copy draft permit. The first is the requirement section and the second snip is from the monitoring section. I also attached the BACT determination for the "shrouds or walls". I'm working with Brian to acquire the demonstration of maximum capacity.

Let me know if you have any questions.
Nancy

Reqs 24-25

Sawmill - Wood Residual Bins

Order 4372 Amendment 1

Reqs 24-25 incorporate New Source Review BACT requirements to control fugitive emissions from operation of the wood residual bin loadout stations and associated truck traffic. Compliance is assured through maintenance and operating records.

Sawmill – Wood Residual Bins

M8. Operations Monitoring

Reqs 24, 25

This monitoring section is drawn from Order 4372 Amendment 1. The permittee is required to record maintenance activities for the residual bins and wind shrouds and maintain a log of wet suppression use in gravel areas associated with the residual bin loadout stations. These

measures confirm ongoing use of best practices to minimize fugitive emissions.

From: Ashley Jones <AVJones@trinityconsultants.com>
Sent: Wednesday, October 17, 2018 4:57 PM
To: Holbrook, Kelsey (ECY) <keho461@ecy.wa.gov>
Cc: Wood-Siglin, Nancy <Nancy.Wood-Siglin2@weyerhaeuser.com>
Subject: RE: Debarker NOC Application - Follow-up Questions

Any of those times work for me. Nancy – let us know what works for you and I can send out a meeting invite and call-in number.

Thanks,
Ashley
253-867-5600 ext.1005

From: Holbrook, Kelsey (ECY) [<mailto:keho461@ecy.wa.gov>]
Sent: Wednesday, October 17, 2018 5:42 PM
To: Ashley Jones <AVJones@trinityconsultants.com>
Cc: Wood-Siglin, Nancy <Nancy.Wood-Siglin2@weyerhaeuser.com>
Subject: RE: Debarker NOC Application - Follow-up Questions

Thanks for the information, Ashley.

I think a call would be beneficial. Nancy, I don't know if you'd like to sit in on the call also and we can go over some updated timelines.

I'm available tomorrow morning after 9:30 AM until noon. I'm also available tomorrow afternoon after 1:30 PM. Let me know if any of those times work for you both.

Thanks,
Kelsey

From: Ashley Jones [<mailto:AVJones@trinityconsultants.com>]
Sent: Wednesday, October 17, 2018 3:22 PM
To: Holbrook, Kelsey (ECY) <keho461@ecy.wa.gov>
Cc: Wood-Siglin, Nancy <Nancy.Wood-Siglin2@weyerhaeuser.com>; Carter, Jack <Jack.Carter@weyerhaeuser.com>; Wess Safford <Wess@swcleanair.org>; Hamilton, Brian <Brian.Hamilton@weyerhaeuser.com>
Subject: FW: Debarker NOC Application - Follow-up Questions

Hi Kelsey,

Thank you for the emails. We have been working to verify information to ensure a correct and appropriate response, so I apologize for the delay. I am providing the information that we can confirm and provide now, and can provide updates as needed.

I have provided responses in **red** font to both emails below.

It may also be helpful to have a call to discuss. Please feel free to reach out or let me know when would be a good time to call.

Thanks,
Ashley
253-867-5600 ext.1005

From: Holbrook, Kelsey (ECY) [<mailto:keho461@ecy.wa.gov>]
Sent: Wednesday, October 17, 2018 2:50 PM
To: Wood-Siglin, Nancy <Nancy.Wood-Siglin2@weyerhaeuser.com>; Ashley Jones <AVJones@trinityconsultants.com>
Cc: Carter, Jack <Jack.Carter@weyerhaeuser.com>; Wess Safford <Wess@swcleanair.org>
Subject: RE: Debarker NOC Application - Follow-up Questions

Hi Ashley and Nancy,

Another comment to follow-up on with the application. The application states that BACT for the debarker will be watering the logs. The application also says that BACT for the conveyors and the bark bins is the implementation of the fugitive dust control plan. Could you include more information on the BACT analysis that was completed? Specifically whether enclosures on the debarker and the bark bin were analyzed. Looking through the RACT/BACT/LAER Clearinghouse it looks like they had a couple of debarkers that were enclosed. Also SWCAA has a few debarkers at sources in their jurisdiction that are also enclosed.

Let me know if you'd like to discuss further.

Response:

The current large debarker ring itself is enclosed for safety reasons with the added benefit of reduced fugitive material from being spread. The entire apparatus has a roof overhead, and there is a wall sheeting along one side, but it is not fully enclosed on all sides due to structure limitations. The roof and wall sheeting also help to reduce fugitive emissions. Weyerhaeuser will maintain these existing structures for the new replacement large debarker, but it will not be fully enclosed. The current bark bin is enclosed and the new bark bin will also be enclosed.

In reviewing the RBLC database most of the search options do not return valid results, except for one summarized below, which are likely the same results you identified. Both of these RBLC entries are for SIP and PSD BACT analyses. The processes are also significantly larger than the Weyerhaeuser

process. Keep in mind that the project emissions are barely over the NOC permitting thresholds. Since the debarking ring has several operational practices that reduce emissions (water spray and partial enclosures) and the bark bin is enclosed, I would not expect that it would be economically and potentially not technically feasible to install further enclosures on the large debarking unit. Please let us know if you would like to discuss further.

RBLC Search:

Process Type 30.999 – Other Wood Products Industry Sources. Process type including “bark”, Pollutant set at PM:

1. Resolute FP US Inc. Catawba Lumber Mill (RBLC ID SC-0181) – Enclosure of debarking operations and proper maintenance and good operating practices. (0.01 lb/ton) for SIP and PSD BACT requirements. 312.5 MMBdft, approximately twice the capacity of the Weyerhaeuser unit.
2. Union County Lumber Company (RBLC ID AR-0124) – El Dorado Sawmill – Hood enclosure on debarker unit. 95% control (0.02 lb/ton). PSD BACT determination. Union County Lumber Company is over 5.5 times the throughput of Weyerhaeuser (i.e. Weyerhaeuser is only 18% of the throughput).

Thanks,
Kelsey

From: Holbrook, Kelsey (ECY)

Sent: Tuesday, October 16, 2018 3:09 PM

To: Wood-Siglin, Nancy <Nancy.Wood-Siglin2@weyerhaeuser.com>; Ashley Jones <AVJones@trinityconsultants.com>

Cc: Carter, Jack <Jack.Carter@weyerhaeuser.com>; 'Wess Safford' <Wess@swcleanair.org>

Subject: Debarker NOC Application - Follow-up Questions

Hi Nancy and Ashley,

Good talking with you both today. As I mentioned on the phone, I have a few follow-up questions/comment after going through the application.

1. The application states that the replacement debarker will be capable of operating at 150 lineal feet per minute. The product information which was included with the application shows a range of debarkers with various feed speeds. None of the listed debarkers have a feed speed of 150 lineal feet per minute. Please provide more information on the specifications for the proposed replacement debarker.

Response: The product information was generalized and not for the specific unit. We are trying to locate the unit specific specification sheet or a way to demonstrate the capacity of 150 lineal feet per minute, which was the advertised capacity provided to Weyerhaeuser from the 3rd party seller.

2. The actual potential to emit was calculated based on the potential annual throughput. Please

provide more information on how the potential annual throughput was calculated. Additionally, could you please provide the full PTE for the debarker and double bark bin? While the minor NSR applicability determination is based on the actual PTE, the full PTE would be beneficial information to have.

Response: The basis for the potential annual throughput was based on information from plant personnel. 135 MMbdft/yr is the facility's entire projected volume from both debarker rings, assuming on a worst case basis that all of the throughput has to be processed in the large debarker ring that is being replaced and the subject of this NOC. A 20% safety factor was also included. This equates to 162 MMbdft/yr. This was described in the Barker Throughput section of the Emissions Calculations in the NOC application write-up.

The full potential to emit would be based on 150 lineal feet per minute, average of 40" logs, 24/7 operation, unless there is a bottle neck elsewhere that would reduce this number. If there are no bottlenecks, 8256 MMbdft would be the full PTE. This increases emissions significantly and are not realistic. Can we discuss this further prior to going down the path of determining potential bottlenecks and emissions that would artificially overstate emissions?

3. There is little discussion on the change in emissions due to the double bark bin versus the single bark bin. Could you provide more information on this?

Response: There is little information on the existing bin since it is an insignificant activity, but the change in the emissions would be relative to the change in potential throughput. No annual throughput increase is anticipated, so no change in emissions is anticipated on an annual basis. On a short term basis, it would be the same increase from 746 tons per hour (75 lineal feet) to 1492 tons per hour (150 lineal feet), so double.

Please let me know if you have any questions or comments.

Thank you,

Kelsey Holbrook
Environmental Engineer
Industrial Section, Solid Waste Management Program
Washington Department of Ecology
Phone: (360) 407-6355
Fax: (360) 407-6102

From: [Thomas, Kevin](#)
To: [Wood-Siglin, Nancy](#)
Subject: FW: Weyco Longview 50" A2 speeds
Date: Friday, October 19, 2018 1:14:25 PM

See the information from Nick below.

Kevin Thomas

Maintenance Supervisor
Longview Export Yard
Cell: 360.270.6970
Office: 360.414.3413



From: Thiemer, Nick <Nick.Thiemer@nicholsonmfg.com>
Sent: Friday, October 19, 2018 10:42 AM
To: Dyer, Bill <Bill.Dyer3@weyerhaeuser.com>
Cc: Kapsch, Josh <Josh.Kapsch@nicholsonmfg.com>; Williams, Rodney <Rodney.Williams@nicholsonmfg.com>
Subject: Weyco Longview 50" A2 speeds

Hi Bill

Below is what we sold and this will get you to **105fpm**. Ring is as OEM at 66rpm.

1x CHHP-6215Y-21-326T (21:1 reducer with top mount for 326T motor)
1x 4E5V8.0 motor sprocket
1x EX2.375 bushing for above
1x 4E5V12.5 gear reducer sprocket
1x EX1.875 bushing for above
1x 4R5V800 belts for motor to reducer
1x 076089-SPECIAL "Feed Drive Belt Guard" (includes 1x 076205, 3x HCS-STL-GR5-.5X13NCX1.25, FLW-STL-A325-.5, HHN-STL-GR5-.5X13NC)
1x B55397 (19T double single sprocket for GR)
2x C45628 (45T 160 sprockets for headshafts)
600x RC160R chain
2x RC160OL offset chain links

Thanks,

Nick Thiemer, P.Eng.
Parts Sales & Service Engineer
Aftermarket Value Stream
Nicholson Manufacturing Ltd
[250-655-7534](tel:250-655-7534)