



August 1, 2024
Project No. 1442.01.005

Ryan Vicente, PE
Air Quality Program, Central Region
Washington State Department of Ecology
1250 W Alder Street
Union Gap, Washington 98903

Re: Oroville Reman & Reload Notice of Construction, Order No. 11AQ-C156

Dear Ryan Vicente:

Oroville Reman & Reload (OR&R) is requesting a simple change to their Notice of Construction Approval Order No. 11AQ-C156 (existing permit) to allow the kiln drying of hemlock lumber. Maul Foster & Alongi prepared this notice of construction application on behalf of OR&R.

Emission factors used as the basis for the existing permit did not consider drying hemlock, as outlined in Condition 7.7. Consistent with Condition 7.7, OR&R is requesting that hemlock be added as an approved lumber species that can be dried in the kilns, subject to the same temperature limits and throughput limits as cedar. Emission factors for hemlock are either equal to or less than the emission factors for cedar, as shown in the following table. In fact, four out of the five toxic air pollutant (TAP) emission factors for cedar are based on the emission factors for hemlock. The basis of the emission factors is being provided electronically as an Excel spreadsheet.

Table 1. Emission Factor Comparison

Pollutant	Wood Species Emission Factor (lb/Mbd-ft)	
	Cedar	Hemlock
VOC*	1.60	1.60
Acetaldehyde	0.1200**	0.1200
Acrolein	0.0015**	0.0015
Formaldehyde	0.0013**	0.0013
Methanol	0.1220	0.0809
Propionaldehyde	0.0012**	0.0012

*Expressed as propane. Factor applies to all species.

**Emission factors for cedar are based on hemlock, as shown in the attached emission factor workbook which was used as the basis for the current permit.

The inclusion of hemlock as an approved species will not increase emissions from the facility and will not result in the release of any new pollutants. Although the emission factor for methanol is lower for hemlock than for cedar, OR&R is not requesting the addition of separate hemlock emission factors. Instead, OR&R is simply requesting that the current permit be updated such that references to “cedar” in the current permit are revised to “cedar and hemlock”.

Because cedar is subject to an annual throughput limit (Condition 4.4), OR&R is requesting that the basis of the 16,513,200 bd-ft limit be changed to reflect the combined throughput of cedar and hemlock.

Because Condition 4.3 states cedar shall not be dried in the same kiln concurrently with lodgepole pine, OR&R is requesting that this condition be revised to state cedar and hemlock shall not be dried in the same kiln concurrently with lodgepole pine.

Proposed Rule Changes

OR&R is requesting that the current permit be updated as shown below. Text to add is in [blue underline](#), and text to remove is in ~~red strikeout~~. No other changes are requested.

Condition 4.2

Kiln throughput quantity shall not exceed 41,283,000 bd·ft/year of combined lodgepole pine, spruce, ~~and~~ cedar [and hemlock](#) (excluding heat treating throughput). Emissions shall not exceed:

Pollutant	Wood Species Emission Factor (lb/Mbd-ft)			
	Spruce	Lodgepole Pine	Combined Spruce and Lodgepole Pine	Combined Cedar and Hemlock
VOC*	1.60	1.60	1.60	1.60
Acetaldehyde	0.0360	0.0120	0.0120	0.1200
Acrolein	0.0005	0.0017	0.0015	0.0015
Formaldehyde	0.0013	0.0040	0.0035	0.0013
Methanol	0.0250	0.0730	0.0730	0.1220
Propionaldehyde	0.0003	0.0019	0.0016	0.0012

*Expressed as propane. [Factor applies to all species.](#)

Condition 4.3

Hourly throughput in each kiln shall not exceed 109,300 board feet (bd·ft) of lodgepole pine. Cedar [and hemlock](#) shall not be dried in the same kiln concurrently with lodgepole pine.

Condition 4.4

Annual kiln [combined](#) cedar [and hemlock](#) throughput shall not exceed 16,513,200 bd·ft.

Condition 7.7

Processing of other wood species in the lumber kilns is subject to Ecology review and approval. Prior to initiating the drying of other species other than lodgepole pine, cedar, [hemlock](#), or spruce, the Permittee must submit information to Ecology sufficient to establish species specific emission factors and to quantify potential emissions changes resulting from the change in wood species. Such changes may require revision of this Order.

Notice of Construction Application

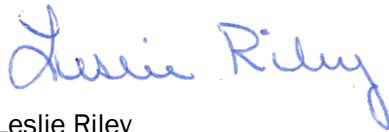
OR&R wishes to dry hemlock in the kilns as soon as practicable, and we're hopeful that Ecology can issue the revised permit as expediently as possible. The Notice of Construction Application form is attached to this letter. This proposed simple change does not include any changes to equipment, does not increase production limits, and does not increase emissions of any pollutant. There is no "construction" being proposed, and the simple changes to the permit language do not affect existing approvals related to ambient air impacts, SEPA, or land use. Therefore, we do not believe that Part 2:

Technical Information of the application form is applicable to the requested permit changes, and information needed to review and approve the proposed changes are provided with this submittal.

We look forward to working with you. Please contact Leslie Riley at lriley@maulfoster.com, or Will Verner at willverner@orovillereoload.com with any questions.

Sincerely,

Maul Foster & Alongi, Inc.



Leslie Riley
Senior Air Quality Specialist

Attachment

A—Notice of Construction Application Form

Excel file—Provided electronically

cc: Will Verner, Oroville Reman & Reload

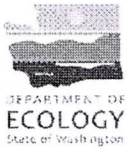
Lynette Haller, Ecology

Attachment A

Notice of Construction Application Form



MAUL
FOSTER
ALONGI



Notice of Construction Application

A notice of construction permit is required before installing a new source of air pollution or modifying an existing source of air pollution. This application applies to facilities in Ecology’s jurisdiction. Submit this application for review of your project. For general information about completing the application, refer to Ecology Forms ECY 070-410a-g, “Instructions for Ecology’s Notice of Construction Application.”

Ecology offers up to two hours of free pre-application assistance. We encourage you to schedule a pre-application meeting with the contact person specified for the location of your proposal, below. If you use up your two hours of free pre-application assistance, we will continue to assist you after you submit Part 1 of the application and the application fee. You may schedule a meeting with us at any point in the process.

Upon completion of the application, please enclose a check for the initial fee and mail to:

**Department of Ecology
Cashiering Unit
PO Box 47611
Olympia, WA 98504-7611**

For Fiscal Office Use Only: 0299-3030404-B00-216--001--000404

Check the box for the location of your proposal. For assistance, call the appropriate office listed below:

Check box	Ecology Permitting Office	Contact
<input checked="" type="checkbox"/>	Chelan, Douglas, Kittitas, Klickitat, or Okanogan County Ecology Central Regional Office (509) 575-2490	Lynnette Haller (509) 457-7126 lynnette.haller@ecy.wa.gov
<input type="checkbox"/>	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Stevens, Walla Walla, or Whitman County Ecology Eastern Regional Office (509) 329-3400	Karin Baldwin (509) 329-3452 karin.baldwin@ecy.wa.gov
<input type="checkbox"/>	San Juan County Ecology Northwest Regional Office (206) 594-0000	David Adler (425) 649-7267 david.adler@ecy.wa.gov
<input type="checkbox"/>	For actions taken at Kraft and Sulfite Paper Mills and Aluminum Smelters Only Ecology Industrial Section (360) 407-6900	James DeMay (360) 407-6868 james.demay@ecy.wa.gov
<input type="checkbox"/>	For actions taken on the US Department of Energy Hanford Reservation Only Ecology Nuclear Waste Program (509) 372-7950	Lilyann Murphy (509) 372-7951 lilyann.murphy@ecy.wa.gov

Check the box below for the fee that applies to your application.

New project or equipment:

- \$1,904: Basic project** initial fee covers up to 16 hours of review.
- \$12,614: Complex project** initial fee covers up to 106 hours of review.

Change to an existing permit or equipment:

- \$357: Administrative or simple change** initial fee covers up to 3 hours of review. Ecology may determine your change is complex during the completeness review of your application. If your project is complex, you must pay the additional xxx before we will continue working on your application
- \$1,190: Complex change** initial fee covers up to 10 hours of review
- \$350flat fee:** Replace or alter control technology equipment under WAC 173-400-114. Ecology will contact you if we determine your change belongs in another fee category. You must pay the fee associated with that category before we will continue working on your application.

Read each statement below, then check the box next to it to acknowledge that you agree.

- The initial fee you submitted may not cover the cost of processing your application. Ecology will track the number of hours spent on your project. If the number of hours Ecology spends exceeds the hours included in your initial fee, Ecology will bill you \$119 per hour for the extra time.
- You must include all information requested by this application. Ecology may not process your application if it does not include all the information requested.
- Submittal of this application allows Ecology staff to visit and inspect your facility.

Part 1: General Information

I. Project, Facility, and Company Information

1. Project Name: Oroville Reman & Reload permit amendment
2. Facility Name: Oroville Reman & Reload Inc.
3. Facility Street Address:
301 9th Avenue, Oroville, WA 98844
4. Facility Legal Description: West Yard 1 Tax 66 part of the NE SE and Tax 7 part of the Adrian C Anson 196 Patten Mill Lines Tax 70 part of the Adrian C Anson 196 Patten and the N47.92' Lot 2, Lots 3, 4, 5 part
5. Company Legal Name (if different from Facility Name):
6. Company Mailing Address (street, city, state, zip)
226 Appleway Oroville, Washington 98844

II. Contact Information and Certification

1. Facility Contact Name (who will be onsite): Jeremy Hughes
2. Facility Contact Mailing Address (if different than Company Mailing Address):

3. Facility Contact Phone Number: 509-476-2935 ext 420
4. Facility Contact E-mail: jeremyhughes@orovillere-load.com
5. Billing Contact Name (who should receive billing information):
Lorraine Gallant
6. Billing Contact Mailing Address (if different Company Mailing Address):
7. Billing contact Phone Number: 509-476-2935 ext 400
8. Billing Contact E-mail: ap@orovillere-load.com
9. Consultant Name (optional – if 3rd party hired to complete application elements):
Leslie Riley
10. Consultant Organization/Company: Maul Foster & Alongi, Inc.
11. Consultant Mailing Address (street, city, state, zip):
12. Consultant Phone Number: 971-713-3578
13. Consultant E-mail: lriley@maulfoster.com
14. Responsible Official Name and Title (who is responsible for project policy or decision making):
Will Verner, VP/General Manager
15. Responsible Official Phone: 509-476-2935 ext 407
16. Responsible Official E-mail: willverner@orovillere-load.com
17. Responsible Official Certification and Signature:

I certify that the information on this application is accurate and complete.

Signature:  Date: 8/1/2024

Part 2: Technical Information

The Technical Information may be sent with this application form to the Cashiering Unit, or may be sent directly to the Ecology regional office with jurisdiction along with a copy of this application form.

For all sections, check the box next to each item as you complete it.

III. Project Description

- Written narrative describing your proposed project.
- Projected construction start and completion dates.
- Operating schedule and production rates.
- List of all major process equipment and manufacturer and maximum rated capacity.
- Process flow diagram with all emission points identified.
- Plan view site map.
- Manufacturer specification sheets for major process equipment components
- Manufacturer specification sheets for pollution control equipment.
- Fuel specifications, including type, consumption (per hour and per year) and percent sulfur.

IV. State Environmental Policy Act (SEPA) Compliance

Check the appropriate box below.

- SEPA review is complete. Include a copy of the final SEPA checklist and SEPA determination (e.g., DNS, MDNS, and EIS) with your application.
- SEPA review has not been conducted:
 - If review will be conducted by another agency, list the agency. You must provide a copy of the final SEPA checklist and SEPA determination before Ecology will issue your permit.
Agency reviewing SEPA: _____
 - If the review will be conducted by Ecology, fill out a SEPA checklist and submit it with your application. You can find a SEPA checklist online at <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-document-templates>

V. Emissions Estimations of Criteria Pollutants

Does your project generate criteria air pollutant emissions? Yes No

If yes, please provide the following information regarding your criteria emissions in the application.

- The names of the criteria air pollutants emitted (i.e., NO_x, SO₂, CO, PM_{2.5}, PM₁₀, TSP, VOC, and Pb)
- Potential emissions of criteria air pollutants in tons per hour, tons per day, and tons per year (include calculations)
- If there will be any fugitive criteria pollutant emissions, clearly identify the pollutant and quantity

VI. Emissions Estimations of Toxic Air Pollutants

Does your project generate toxic air pollutant emissions? Yes No

If yes, please provide the following information regarding your toxic air pollutant emissions in your application.

- The names of the toxic air pollutants emitted (specified in WAC 173-460-150¹)
- Potential emissions of toxic air pollutants in pounds per hour, pounds per day, and pounds per year (include calculations)
- If there will be any fugitive toxic air pollutant emissions, clearly identify the pollutant and quantity

VII. Emission Standard Compliance

- Provide a list of all applicable new source performance standards, national emission standards for hazardous air pollutants, national emission standards for hazardous air pollutants for source categories, and emission standards adopted under Chapter 70A.15 RCW.

Does your project comply with all applicable standards identified? Yes No

VIII. Best Available Control Technology

- Provide a complete evaluation of Best Available Control Technology (BACT) for your proposal.

IX. Ambient Air Impacts Analyses

Please provide the following:

- Ambient air impacts analyses for Criteria Air Pollutants (including fugitive emissions)
- Ambient air impacts analyses for Toxic Air Pollutants (including fugitive emissions)
- Discharge point data for each point included in air impacts analyses (include only if modeling is required)
 - Exhaust height
 - Exhaust inside dimensions (ex. diameter or length and width)
 - Exhaust gas velocity or volumetric flow rate
 - Exhaust gas exit temperature
 - The volumetric flow rate
 - Description of the discharges (i.e., vertically or horizontally) and whether there are any obstructions (ex., raincap)
 - Identification of the emission unit(s) discharging from the point
 - The distance from the stack to the nearest property line
 - Emission unit building height, width, and length
 - Height of tallest building on-site or in the vicinity and the nearest distance of that building to the exhaust
 - Whether the facility is in an urban or rural location

Does your project cause or contribute to a violation of any ambient air quality standard or acceptable source impact level? Yes No

To request ADA accommodation, call Ecology at (360) 407-6800, 711 (relay service), or (877) 833-6341 (TTY)

¹ <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-460-150>