



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 3, 2018

Nancy Wood-Siglin
Weyerhaeuser NR Company
P.O. Box 638
Longview, WA 98632

Re: Weyerhaeuser NR Company Debarker Upgrade NOC Order No. 16068

Dear Nancy Wood-Siglin:


Please find enclosed the Notice of Construction (NOC) Order No. 16068. This order approves the replacement of the existing large debarker and single-bay bark bin with a refurbished large debarker and double-bay bark bins.

Ecology's SEPA determination of non-significance and the project application were posted on the Industrial Section's website for review between October 31, 2018 and November 16, 2018. During that time the public had the opportunity to provide comments on the SEPA determination and the ability to request a comment period on the draft NOC Order. One comment was received on the SEPA determination but did not result in a change to the determination. We did not receive any requests to provide a public comment period for the draft Order.

If you have any comments or questions concerning the content of this NOC, please contact Kelsey Holbrook at (360) 407-6355 or kelsey.holbrook@ecy.wa.gov.

If you wish to appeal, you must follow the procedures described in the Order.

Sincerely,


James DeMay, P.E.
Industrial Section Manager
Solid Waste Management Program

Enclosure

By certified mail: [9489-0090-0027-6019-6818-47]



**WASHINGTON DEPARTMENT OF ECOLOGY
MAIL STOP 47600
OLYMPIA, WASHINGTON 98504**

IN THE MATTER OF AIR EMISSIONS FROM:

WEYERHAEUSER NR COMPANY)	NOC ORDER No. 16068)
P.O. BOX 638)		
LONGVIEW, WA 98632)		

DESCRIPTION

Weyerhaeuser NR Company (Weyerhaeuser) operates a log sorting and export yard and a lumber mill in Longview, Washington along the Columbia River as part of a larger industrial complex. Prior to 2016, Weyerhaeuser operated the log yard and lumber mill as well as a Kraft pulp and paper mill located adjacent to the lumber mill property. A thermo-mechanical pulp (TMP) mill was operated as a 50/50 joint venture between Weyerhaeuser and Nippon Paper Industries. These operations were considered one major stationary source for Title V permitting. In 2016 the Kraft pulp and paper mill and the TMP mill were sold to two different companies. As of the issuance date of this Order, the three facilities are still considered one major stationary source. This single source is considered an existing major source under the Prevention of Significant Deterioration (PSD) program and currently operate under three separate Air Operating Permits (AOPs) issued by the Washington State Department of Ecology (Ecology). Weyerhaeuser was issued AOP 0000125 on October 6, 2017.

Approximately 400,000,000 board feet of logs are processed at the log sort and export yard annually. Logs are received, sorted based on size, and a portion of the logs are debarked prior to exporting. Weyerhaeuser operates two debarking rings: the large debarker and the small debarker. Weyerhaeuser is proposing to replace the large debarker with a newer unit with approximately double the feed rate of the current debarker. Bark is then transferred on conveyors to a bark bin. When the bin is full, bark is unloaded to a truck for removal offsite. Weyerhaeuser is also proposing to replace the current single-bay bark bin with a double-bay bark bin.

FINDINGS

Pursuant to New Source Review (NSR) regulations in the Washington Administrative Code (WAC) 173-400-110, and 173-400-111, and based upon the complete NOC Application submitted by Weyerhaeuser and the technical analysis performed by Ecology, Ecology now finds the following:

1. An initial NOC application dated September 28, 2018 was submitted by Weyerhaeuser for the Debarker Upgrade project. Ecology received the application on October 2, 2018. Additional application material was received on October 17, 18, and 19, 2018. The application was found to be complete on October 26, 2018.

2. In accordance with the application, the large debarker and the bark bin are the only units that are being modified by this project and, therefore, are the only units that are subject to this Order.

Weyerhaeuser is proposing to replace the large debarker. According to the application, the new debarker has a maximum feed rate of 150 lineal feet per minute. The current debarker has a maximum feed rate of 75 lineal feet per minute. Weyerhaeuser is also proposing to replace the single-bay bark bin with a double-bay bark bin. The primary pollutants expected to be emitted as a result of this project are total suspended particulate (TSP), particulate matter smaller than 10 microns (PM-10), and particulate matter smaller than 2.5 microns (PM-2.5).

3. While the short term processing rate will double, the application states that it is not the intent of the project to increase the annual throughput rate of 256,490 tons per year of logs.
4. Emissions from the project are greater than the de minimis emission rates in WAC 173-400-110(5) for some of the criteria pollutants, shown in bold in Table 1 below. Therefore, new source review permitting is required to permit the changes to the new units. The permit application provided the required elements of a NOC application.

Table 1. Emissions of Criteria Pollutants, NSR Exemption Levels, and SER

Pollutant	Project Emissions (tons/year)	NSR Exemption (tons/year)	SER (tons/year)
TSP	2.06	1.25	25
PM-10	1.12	0.75	15
PM-2.5	0.17	0.5	10

5. As of the issuance date of this Order, the single major source, which consists of three separate entities, has the potential to emit greater than 100 tpy for at least one PSD pollutant. The source is therefore classified as a major stationary source under the PSD permitting program, and is, therefore, subject to PSD permitting consideration under WAC 173-400-720 and 40 CFR 52.21, in accordance with 40 CFR 52.21(2)(i). Weyerhaeuser provided the estimate of the pollutants emitted, which are shown in Table 1 above, along with the Significant Emission Rate (SER).

Ecology notes that Weyerhaeuser did not request a PSD applicability determination from Ecology for this project and no such determination was made.

6. In accordance with WAC 173-400-111, the pollutants that are subject to minor new source review (TSP and PM-10) must meet the following criteria:
 - a. The proposed modified sources must comply with all applicable new source performance standards (NSPS), national emission standards for hazardous air pollutants (NESHAPs), and emission standards adopted under chapter 70.94 RCW.

- b. The proposed modified sources will employ best achievable control technology (BACT) for any new pollutants or any criteria pollutant for which emissions will be increased by the project,
- c. The proposed modified sources will not cause or contribute to a violation of any ambient air quality standards.

Each of these criteria are discussed in detail below.

- 7. The applicable emission standards are discussed in the Regulatory Review Section of the application. No applicable NSPS, NESHAPS, or specific emission standards exist for debarking units or bark bins. All emission units are required to meet the general emission standards included in WAC 173-400-040, including, but not limited to, WAC 173-400-040(4).
 - a. WAC 173-400-040(4) requires owners and operators of any emission unit engaging in materials handling, construction, demolition or other operation which is a source of fugitive emissions and that is located in an attainment area to take reasonable precautions to prevent the release of air contaminants from the operation.
 - b. As discussed below, the facility currently implements a fugitive dust control plan at the log yard. The plan will be required to be updated to include the new debarker and bark bins to ensure that reasonable precautions will be taken to prevent the release of air contaminants from the debarking operations.
- 8. As required, a BACT review has been performed for the debarker and the bark bin.

The current debarker is partially enclosed with a roof and one wall. Additionally the debarker ring is enclosed which reduces particulate emissions. Weyerhaeuser currently implements a fugitive dust control plan at the log yard. It has been determined that BACT for the debarker is partial enclosure and the use of water sprays on the logs prior to debarking. BACT for the bark bins consists of partial enclosure around the truck loadout area and the continued implementation of the fugitive dust control plan.

- 9. An environmental checklist was submitted with the NOC Application which considered environmental impacts of the project as required by chapter 43.21C of the Revised Code of Washington (RCW), also known as the State Environmental Policy Act (SEPA). Ecology reviewed the checklist and made a Determination of Nonsignificance (DNS) which was signed on October 30, 2018 and made available for public comment on October 31, 2018. Ecology received one comment during the public comment period. No changes were made to the SEPA determination or the NOC Order based on this comment.
- 10. The proposed project meets all applicable federal and state rules and regulations implemented by Ecology including:

General Regulations for Air Pollution Sources, Chapter 173-400 WAC, 40 CFR Part 60, New Source Performance Standards, 40 CFR Part 61 and National Emission Standards for Hazardous Air Pollutants (NESHAPs) 40 CFR Part 63.

11. Per WAC 173-400-171(2), the application was posted on the Industrial Section's website between October 31, 2018 and November 16, 2018 with information on how to request a public comment period on the draft Order. No such requests were received.

THEREFORE, it is ordered that the project, as described in said NOC permit application and other information submitted to the Ecology in reference thereto, is approved subject to the conditions listed below.

CONDITIONS

1. Weyerhaeuser is limited to processing 256,490 tons of logs per year through the large debarker ring at the log sort and export yard. Annual TSP emissions from the debarker and the bark bin must not exceed 2.06 tons per year (tpy). Annual PM-10 emissions from the debarker and the bark bin must not exceed 1.12 tpy. Weyerhaeuser must keep a log of bark bin loadout activities and the hours of operation of the large debarker ring at the log sort and export yard. This log must be kept onsite and made available to the permitting authority upon request.
2. Weyerhaeuser must install and maintain the following:
 - a. Partial enclosure for the large debarker unit, including the full enclosure of the debarker ring.
 - b. Two-sided wind shrouds at the bark bin loadout area.
3. Weyerhaeuser must submit an updated Fugitive Dust Control Plan to the permitting authority within 30 days of completion of the Debarker Upgrade project. The update must include procedures for minimizing fugitive emissions from the debarker and the bark bins, including, but not limited to, the use of water sprays on the logs prior to debarking. A copy of the Fugitive Dust Control Plan must be kept onsite and made available to the permitting authority upon request.
4. The debarker and bark bin must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times.
5. Weyerhaeuser shall notify the permitting authority in writing within thirty days of completion of the Debarker Upgrade project.
6. Any activity or operation, which is undertaken by Weyerhaeuser or others, in a manner which is inconsistent with the notice of construction application received by Ecology on October 2, 2018, other information submitted to Ecology in reference thereto, and this order, shall be subject to enforcement by the permitting authority under applicable regulation. Nothing in this order shall be construed so as to relieve Weyerhaeuser of its obligations under any state, local, or federal laws or regulations.

7. This approval shall become void if construction is not commenced within eighteen (18) months after receipt of this approval, or if construction of the project is discontinued for a period of eighteen (18) months.

YOUR RIGHT TO APPEAL

You have a right to appeal this Order to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of this Order. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do both of the following within 30 days of the date of receipt of this Order:

- File your appeal and a copy of this Order with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this Order on Ecology in paper form - by mail or in person. (See addresses below.) E-mail is not accepted.

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC.

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

ADDRESS AND LOCATION INFORMATION

Street Addresses	Mailing Addresses
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608
Pollution Control Hearings Board 1111 Israel Road SW STE 301 Tumwater, WA 98501	Pollution Control Hearings Board PO Box 40903 Olympia, WA 98504-0903

MORE INFORMATION

- **Pollution Control Hearings Board**
www.eho.wa.gov/Boards_PCHB.aspx
- **Chapter 43.21B RCW, Environmental Hearings Office – Pollution Control Hearings Board**
<http://apps.leg.wa.gov/RCW/default.aspx?cite=43.21B>
- **Chapter 371-08 WAC – Practice and Procedure**
<http://apps.leg.wa.gov/WAC/default.aspx?cite=371-08>
- **Chapter 34.05 RCW – Administrative Procedure Act**

<http://apps.leg.wa.gov/RCW/default.aspx?cite=34.05>

- **Chapter 70.94 RCW, Washington Clean Air Act**
<http://apps.leg.wa.gov/RCW/default.aspx?cite=70.94>
- **Air Quality Rules**
<https://ecology.wa.gov/Air-Climate/Air-quality/Business-industry-requirements/Permits-for-burning-industrial>

SIGNATURES

Reviewed by:



Kelsey Holbrook
Environmental Engineer
Solid Waste Management Program

12/3/18

Date

Signature Authority:



James DeMay, P.E.
Industrial Section Manager
Solid Waste Management Program

12/3/18

Date