

# SEPA ENVIRONMENTAL CHECKLIST

## ***Purpose of checklist:***

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

## ***Instructions for applicants:***

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

## ***Instructions for Lead Agencies:***

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

## ***Use of checklist for nonproject proposals:***

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the [SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS \(part D\)](#). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

## **A. Background** [\[HELP\]](#)

1. Name of proposed project, if applicable:  
Longview Weyerhaeuser Longview Sort Yard Debarker and bins replacement
2. Name of applicant:  
Weyerhaeuser NR Company Lonview Sort Yard
3. Address and phone number of applicant and contact person:  
Nancy Wood Siglin, Environmental Manager  
Brian Hamilton Operations Manager
4. Date checklist prepared:  
September 27, 2018
5. Agency requesting checklist:  
Department of Ecology Kelsey Holbrook, Waste 2 Resources, Industrial Section
6. Proposed timing or schedule (including phasing, if applicable):  
Begin in October 2018 with debarker replacement and complete bin replacement by year end 2019.
7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.  
No plans
8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.  
Notice of Construction application with estimated emission change.
9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.  
None
10. List any government approvals or permits that will be needed for your proposal, if known.  
The facility operates under Air Operating Permit 0000125. A Notice of Construction was submitted for review along with this SEPA checklist to Ecology the lead agency.
11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)  
Weyerhaeuser intends to replace its existing debarker at the Longview sawmill facility with one that operates at a higher capacity, as well as replace its single-bay bark bin with a double-bay bark bin that is being repurposed from another facility.
12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.  
1701 Industrial Way, Longview, Washington 98632

## **B. Environmental Elements** [\[HELP\]](#)

## 1. **Earth** [\[help\]](#)

a. General description of the site:

(circle one): **Flat**, rolling, hilly, steep slopes, mountainous, other \_\_\_\_\_

b. What is the steepest slope on the site (approximate percent slope)?

Site is flat and an existing paved industrial facility.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

Site is a paved industrial site.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

No

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

Not applicable

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

Not applicable

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

100% before and after the project. Project is equipment replacement only.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

Not applicable

## 2. **Air** [\[help\]](#)

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

Though no changes are intended for the quantity of wood processed in a given year, the capacity of the new debarker ring is double that of the one currently installed, which will allow for the processing to occur at a faster rate.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

The neighboring Nippon and NORPAC mill sites produce several emissions that are permitted under the Clean Air Act, however; none of these emissions are known to affect this project.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

Any potential fugitive emissions will be control with sprinkling devices.

## 3. **Water** [\[help\]](#)

a. Surface Water: [\[help\]](#)

- 1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

The Columbia River is south of the property.

- 2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

No

- 3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

No

- 4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

No

- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

No

- 6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No

b. Ground Water: [\[help\]](#)

- 1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

No

- 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

Not applicable

c. Water runoff (including stormwater):

- 1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

The project will not alter existing drainage. Facility operates under existing NPDES Waste Water Discharge permit WA0000124.

- 2) Could waste materials enter ground or surface waters? If so, generally describe.

No

- 3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

No

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

No change

#### 4. **Plants** [\[help\]](#)

a. Check the types of vegetation found on the site:

- Deciduous tree: alder, maple, aspen, other
- Evergreen tree: fir, cedar, other
- Shrubs
- grass
- pasture
- crop or grain
- wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
- water plants: water lily, eelgrass, milfoil, other
- other types of vegetation

b. What kind and amount of vegetation will be removed or altered?

None

c. List threatened and endangered species known to be on or near the site.

No threatened or endangered plants or other species have been found living on the site

Several species of listed salmonids are known to traverse the Columbia River adjacent to the site

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

None proposed

e. List all noxious weeds and invasive species known to be on or near the site.

None known

#### 5. **Animals** [\[help\]](#)

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site.

Examples include:

birds: hawks, heron, eagle, songbirds, other: Eagles, Osprey & Songbirds

mammals: deer, bear, elk, beaver, other: Nutria

fish: bass, salmon, trout, herring, shellfish, other: Sturgeon, Pacific Eulachon, Pike Minnow are known to migrate or exist near the site.

b. List any threatened and endangered species known to be on or near the site.

*The following species use the Columbia River as a migratory corridor:*

*Upper Columbia River Spring Chinook (Endangered)*

*Snake River Fall Chinook (Threatened)*

*Snake River spring-summer Chinook (Threatened)*

*Snake River Sockeye (Endangered)*

*Snake River Steelhead (Threatened)*

*Middle Columbia River Steelhead (Threatened)*  
*Upper Columbia River Steelhead (Endangered)*  
*Lower Columbia River Steelhead (Threatened)*  
*Lower Columbia River Chinook (Threatened)*  
*Lower Columbia River Coho (Candidate for listing)*  
*Columbia River Bull Trout (Threatened)*  
*Columbia River Chum (Threatened)*  
*Searun Cutthroat Trout (Proposed as Threatened)*  
*Bald Eagles (Threatened)*  
*Steller Sea Lions (Threatened)*  
*Pacific Eulachon (Threatened)*

c. Is the site part of a migration route? If so, explain.  
Yes. *The Columbia River is a migration route for fish.*

d. Proposed measures to preserve or enhance wildlife, if any:  
None proposed

e. List any invasive animal species known to be on or near the site.  
None

## **6. Energy and Natural Resources** [\[help\]](#)

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Electricity will continue to be utilized by the operation of the replacement equipment.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

No

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

None

## **7. Environmental Health** [\[help\]](#)

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

No

1) Describe any known or possible contamination at the site from present or past uses.

None

2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

None

- 3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

None

- 4) Describe special emergency services that might be required.

No change from existing practice.

- 5) Proposed measures to reduce or control environmental health hazards, if any:

None

**b. Noise**

- 1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

The type and intensity of noise will be similar to existing conditions (heavy industrial manufacturing, including pulp and paper manufacture, steam and power production, lumber planing, log sort activity, and railroad switchyard operations).

- 2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

The type and intensity of noise will be similar to existing conditions (heavy industrial manufacturing, including pulp and paper manufacture, steam and power production, lumber planing, log sort activity, and railroad switchyard operations).

- 3) Proposed measures to reduce or control noise impacts, if any:

None

**8. Land and Shoreline Use** [\[help\]](#)

- a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

Current use of the site is heavy industrial activity. The adjacent properties are used for heavy industrial activities including pulp and paper manufacture, steam and power production, lumber sawing and planing, log storage and shipping, and railroad switchyard operations.

Neighboring properties to east and west are also heavy industrial (bulk material handling and Port operations). To the north, across Industrial Way, is a mixture of residential and light industrial properties. The Columbia River is immediately south of the project location

- b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated,

how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

No

1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

No

c. Describe any structures on the site.

Existing structures include buildings that house the debarker units and equipment. Material bins and conveyors are co-located at the project site. Various other buildings on the property include equipment shops, office buildings and lunch rooms.

d. Will any structures be demolished? If so, what?

No

e. What is the current zoning classification of the site?

Heavy Manufacturing/Heavy Industrial (HM/HI)

f. What is the current comprehensive plan designation of the site?

Heavy Manufacturing/Heavy Industrial (HM/HI)

g. If applicable, what is the current shoreline master program designation of the site?

Urban

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

No

i. Approximately how many people would reside or work in the completed project?

100

j. Approximately how many people would the completed project displace?

None

k. Proposed measures to avoid or reduce displacement impacts, if any:

None proposed

L. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

None

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:

None

**9. Housing** [\[help\]](#)

- a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

None

- b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

None

- c. Proposed measures to reduce or control housing impacts, if any:

None

**10. Aesthetics** [\[help\]](#)

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

45 foot tall material bin. Exterior surface material is metal.

- b. What views in the immediate vicinity would be altered or obstructed?

None

- b. Proposed measures to reduce or control aesthetic impacts, if any:

None

**11. Light and Glare** [\[help\]](#)

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

No change to existing light and glare

- b. Could light or glare from the finished project be a safety hazard or interfere with views?

No

- c. What existing off-site sources of light or glare may affect your proposal?

None

- d. Proposed measures to reduce or control light and glare impacts, if any:

None

**12. Recreation** [\[help\]](#)

- a. What designated and informal recreational opportunities are in the immediate vicinity?

The following recreational activities may occur on the Columbia River; fishing, water skiing, boating, and canoeing

- b. Would the proposed project displace any existing recreational uses? If so, describe.

No

- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

None

**13. Historic and cultural preservation** [\[help\]](#)

- a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers ? If so, specifically describe.

No

- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

No such landmarks are known to be on or next to site.

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

The proposed project is a replacement for existing equipment and proposed no change to cultural and historic resources.

- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

None

**14. Transportation** [\[help\]](#)

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

The primary site access point is the Weyerhaeuser Gate Four, located West of the intersection of Highway 432 (Industrial Way) and Oregon Way

- b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

No, the site is not served by public transit, however; the nearest public transit stop is at 32nd Street and Washington Way approximately 2.5 miles away

- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

None

- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

NO

- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

Existing rail line

- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

No change in vehicular trips.

- g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

No

- h. Proposed measures to reduce or control transportation impacts, if any:

None

### 15. **Public Services** [\[help\]](#)

- a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

No

- b. Proposed measures to reduce or control direct impacts on public services, if any.

None

### 16. **Utilities** [\[help\]](#)

- a. Circle utilities currently available at the site:

electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other \_\_\_\_\_

All utilities are available on site

- c. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

None

### C. **Signature** [\[HELP\]](#)

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: \_\_\_\_\_

Name of signee \_\_\_\_\_

Position and Agency/Organization \_\_\_\_\_

Date Submitted: \_\_\_\_\_

## **D. Supplemental sheet for nonproject actions** [\[HELP\]](#)

(IT IS NOT NECESSARY to use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

Proposed measures to avoid or reduce such increases are:

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

3. How would the proposal be likely to deplete energy or natural resources?

Proposed measures to protect or conserve energy and natural resources are:

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

Proposed measures to protect such resources or to avoid or reduce impacts are:

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

Proposed measures to avoid or reduce shoreline and land use impacts are:

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

Proposed measures to reduce or respond to such demand(s) are:

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

**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

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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**

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**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

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**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](mailto:keho461@ecy.wa.gov)>  
**Cc:** Hamilton, Brian <[Brian.Hamilton@weyerhaeuser.com](mailto:Brian.Hamilton@weyerhaeuser.com)>; Carter, Jack <[Jack.Carter@weyerhaeuser.com](mailto:Jack.Carter@weyerhaeuser.com)>; Wess Safford <[Wess@swcleanair.org](mailto: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**

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**From:** Holbrook, Kelsey (ECY) <[keho461@ecy.wa.gov](mailto:keho461@ecy.wa.gov)>  
**Sent:** Monday, October 08, 2018 10:45 AM  
**To:** Wood-Siglin, Nancy <[Nancy.Wood-Siglin2@weyerhaeuser.com](mailto:Nancy.Wood-Siglin2@weyerhaeuser.com)>  
**Cc:** Hamilton, Brian <[Brian.Hamilton@weyerhaeuser.com](mailto:Brian.Hamilton@weyerhaeuser.com)>; Carter, Jack <[Jack.Carter@weyerhaeuser.com](mailto:Jack.Carter@weyerhaeuser.com)>; Wess Safford <[Wess@swcleanair.org](mailto: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

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**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](mailto:keho461@ecy.wa.gov)>; Wess Safford <[Wess@swcleanair.org](mailto:Wess@swcleanair.org)>

**Cc:** Hamilton, Brian <[Brian.Hamilton@weyerhaeuser.com](mailto:Brian.Hamilton@weyerhaeuser.com)>; Carter, Jack <[Jack.Carter@weyerhaeuser.com](mailto: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

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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**

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**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](mailto: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](mailto:AVJones@trinityconsultants.com)>  
**Sent:** Wednesday, October 17, 2018 4:57 PM  
**To:** Holbrook, Kelsey (ECY) <[keho461@ecy.wa.gov](mailto:keho461@ecy.wa.gov)>  
**Cc:** Wood-Siglin, Nancy <[Nancy.Wood-Siglin2@weyerhaeuser.com](mailto: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](mailto:AVJones@trinityconsultants.com)>  
**Cc:** Wood-Siglin, Nancy <[Nancy.Wood-Siglin2@weyerhaeuser.com](mailto: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](mailto:keho461@ecy.wa.gov)>  
**Cc:** Wood-Siglin, Nancy <[Nancy.Wood-Siglin2@weyerhaeuser.com](mailto:Nancy.Wood-Siglin2@weyerhaeuser.com)>; Carter, Jack <[Jack.Carter@weyerhaeuser.com](mailto:Jack.Carter@weyerhaeuser.com)>; Wess Safford <[Wess@swcleanair.org](mailto:Wess@swcleanair.org)>; Hamilton, Brian <[Brian.Hamilton@weyerhaeuser.com](mailto: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](mailto:Nancy.Wood-Siglin2@weyerhaeuser.com)>; Ashley Jones <[AVJones@trinityconsultants.com](mailto:AVJones@trinityconsultants.com)>  
**Cc:** Carter, Jack <[Jack.Carter@weyerhaeuser.com](mailto:Jack.Carter@weyerhaeuser.com)>; Wess Safford <[Wess@swcleanair.org](mailto: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](mailto:Nancy.Wood-Siglin2@weyerhaeuser.com)>; Ashley Jones <[AVJones@trinityconsultants.com](mailto:AVJones@trinityconsultants.com)>

**Cc:** Carter, Jack <[Jack.Carter@weyerhaeuser.com](mailto:Jack.Carter@weyerhaeuser.com)>; 'Wess Safford' <[Wess@swcleanair.org](mailto: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 3<sup>rd</sup> 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 27<sup>th</sup>, 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.

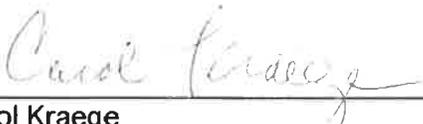
The Pollution Control Hearings Board  
4224 6<sup>th</sup> Avenue SE, Rowe Six, Bldg 2  
P.O. Box 40903  
Olympia, Washington 98504-0903

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 27<sup>th</sup> 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](mailto:keho461@ecy.wa.gov)>; Ashley Jones <[AVJones@trinityconsultants.com](mailto: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](mailto:AVJones@trinityconsultants.com)>; Kelsey Holbrook  
([kelsey.holbrook@ecy.wa.gov](mailto:kelsey.holbrook@ecy.wa.gov)) <[kelsey.holbrook@ecy.wa.gov](mailto:kelsey.holbrook@ecy.wa.gov)>  
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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.

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**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**

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**Reqs 24, 25**

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**Cc:** Wood-Siglin, Nancy <[Nancy.Wood-Siglin2@weyerhaeuser.com](mailto: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

---

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**Sent:** Wednesday, October 17, 2018 3:22 PM  
**To:** Holbrook, Kelsey (ECY) <[keho461@ecy.wa.gov](mailto:keho461@ecy.wa.gov)>  
**Cc:** Wood-Siglin, Nancy <[Nancy.Wood-Siglin2@weyerhaeuser.com](mailto:Nancy.Wood-Siglin2@weyerhaeuser.com)>; Carter, Jack <[Jack.Carter@weyerhaeuser.com](mailto:Jack.Carter@weyerhaeuser.com)>; Wess Safford <[Wess@swcleanair.org](mailto:Wess@swcleanair.org)>; Hamilton, Brian <[Brian.Hamilton@weyerhaeuser.com](mailto: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

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**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](mailto:Nancy.Wood-Siglin2@weyerhaeuser.com)>; Ashley Jones <[AVJones@trinityconsultants.com](mailto:AVJones@trinityconsultants.com)>  
**Cc:** Carter, Jack <[Jack.Carter@weyerhaeuser.com](mailto:Jack.Carter@weyerhaeuser.com)>; Wess Safford <[Wess@swcleanair.org](mailto: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

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**From:** Holbrook, Kelsey (ECY)

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

**To:** Wood-Siglin, Nancy <[Nancy.Wood-Siglin2@weyerhaeuser.com](mailto:Nancy.Wood-Siglin2@weyerhaeuser.com)>; Ashley Jones <[AVJones@trinityconsultants.com](mailto:AVJones@trinityconsultants.com)>

**Cc:** Carter, Jack <[Jack.Carter@weyerhaeuser.com](mailto:Jack.Carter@weyerhaeuser.com)>; 'Wess Safford' <[Wess@swcleanair.org](mailto: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 3<sup>rd</sup> 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

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See the information from Nick below.

## ***Kevin Thomas***

Maintenance Supervisor  
Longview Export Yard  
Cell: 360.270.6970  
Office: 360.414.3413



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**From:** Thiemer, Nick <[Nick.Thiemer@nicholsonmfg.com](mailto:Nick.Thiemer@nicholsonmfg.com)>  
**Sent:** Friday, October 19, 2018 10:42 AM  
**To:** Dyer, Bill <[Bill.Dyer3@weyerhaeuser.com](mailto:Bill.Dyer3@weyerhaeuser.com)>  
**Cc:** Kapsch, Josh <[Josh.Kapsch@nicholsonmfg.com](mailto:Josh.Kapsch@nicholsonmfg.com)>; Williams, Rodney <[Rodney.Williams@nicholsonmfg.com](mailto: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)