

June 10, 2020

Luke Thies, Environmental Manager
Weyerhaeuser NR Company
105 Mills Drive
Columbia Falls, Montana 59912

Sent Via Email: luke.thies@weyerhaeuser.com

RE: Request to Postpone Boiler Source Testing

Dear Mr. Thies:

On May 8, 2020, the Montana Department of Environmental Quality (DEQ) received a request from Weyerhaeuser NR Company (Weyerhaeuser) to postpone source testing at the Riley-Union Stoker Boiler (Boiler) until later in 2020. Weyerhaeuser submitted a Source Test Protocol to DEQ on April 8, 2020 that described planned testing at the Boiler. Weyerhaeuser planned to test the Boiler during the week of June 20, 2020 for filterable particulate matter (PM), hydrogen chloride, mercury, and carbon monoxide, as required under Montana Operating Permit (Operating Permit) #OP2667-04 (Effective 7/14/2017) and Montana Air Quality Permit (MAQP) #2667-14 (Final 1/21/2017).

Under the authority of the Administrative Rules of Montana (ARM) 17.8.342 and 40 Code of Federal Regulations (CFR) 63, Subpart DDDDD, Section III.B.15 of Operating Permit #OP2667-04 requires Weyerhaeuser to conduct source testing on the Boiler to demonstrate compliance with the conditions in Section II.B.9 of Operating Permit #OP2667-04. Weyerhaeuser most recently tested the emissions as required by 40 CFR 63, Subpart DDDDD on June 20, 2017, and demonstrated compliance with the emission limits. 40 CFR 63, Subpart DDDDD requires the next source testing to be completed within 37 months of the previous testing.

The postponement request noted that Weyerhaeuser is experiencing intermittent operations due to uncertainty in the markets caused by the COVID-19 pandemic. Weyerhaeuser plans to reschedule the source testing activities when Weyerhaeuser is back to full production, hopefully, later in the summer.

DEQ approves the request to postpone the Boiler emission testing as required under Operating Permit #OP2667-04 with the following conditions:

- Weyerhaeuser shall complete the delayed tests no later than December 31, 2020.
- DEQ expects future source testing of the Boiler to be conducted within the previously anticipated schedule, or to be completed by August 20, 2023.

- Weyerhaeuser shall comply with all other applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in Operating Permit #OP2667-04.
- All source tests must be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (MSTPPM) (ARM 17.8.106).
- Section 2 of the MSTPPM states that confirmation of the test date is required a minimum of three working days prior to the source test. DEQ understands that a test date may need to change for various reasons, but notification of any change must be submitted to DEQ prior to the test. Notification may be submitted by email or telephone. Failure to provide an actual source test date notification may result in DEQ's rejection of the source test results.

Should you have any questions regarding the information contained in this letter, please contact me at (406) 258-4907, or by email at kawilson@mt.gov.

Sincerely,



Karen J. Wilson, MS
Senior Environmental Science Specialist

Air Quality Bureau
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cc: Mitchell Leu, Weyerhaeuser, Mitchell.leu@weyerhaeuser.com
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