DEQ
Montana Department of Environmental Quality

Air, Energy & Mining Division

Date of Posting: January 21, 2026

Ashley Williams
Weyerhaeuser NR Company
Kalispell Facility
75 Sunset Drive
Kalispell, MT 59901

RE: Final and Effective Montana Air Quality Permit #2602-14

Sent via email: Ashley.williams@weyerhaeuser.com

Dear Ms. Williams:

Montana Air Quality Permit (MAQP) #2602-14 for the above-named permittee is deemed final and effective as of January 21, 2026, by the Montana Department of Environmental Quality (DEQ). All conditions of the Decision remain the same. A copy of final MAQP #2602-14 is enclosed.

For DEQ,

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Montana Department of Environmental Quality
Air, Energy & Mining Division
Air Quality Bureau

Montana Air Quality Permit #2602-14

Weyerhaeuser NR Company
Kalispell Facility
75 Sunset Drive, Kalispell, MT 59901

Final and Effective Date:
January 21, 2026

MONTANA AIR QUALITY PERMIT

Issued to: Weyerhaeuser NR Company
Kalispell Facility
P.O. Box 5257
Kalispell, MT 59903

MAQP: #2602-14
Application Complete: 11/07/2025
Preliminary Determination Issued: 12/16/2025
DEQ's Decision Issued: 01/05/2026
Permit Final: 01/21/2026

A Montana Air Quality Permit (MAQP), with conditions, is hereby granted to Weyerhaeuser NR Company (Weyerhaeuser) pursuant to Section 75-2-204 and 211, Montana Code Annotated (MCA), as amended, and the Administrative Rules of Montana (ARM), 17.8.740, *et seq.*, as amended, for the following:

Section I: Permitted Facilities

A. This permit covers all existing sources of air contaminants at Weyerhaeuser's Kalispell plywood plant located approximately 3 miles northeast of Kalispell, Montana, near the Evergreen subdivision in the SW ¼ of Section 33, Township 29 North, Range 21 West, Flathead County, Montana, Latitude 48.2328° North, Longitude -114.2852° West. A listing of permitted equipment is contained in the permit analysis attached to this permit.

B. Current Permit Action

On October 24, 2025, DEQ received an application from Weyerhaeuser to increase the allowable operating hours of the RDO 616 Screener from 962 to 1,500 hours per year, pushing the potential to emit (PTE) for particulate matter (PM) over the 5 tons per year de minimis threshold. A more detailed description of this aspect of the proposed permit modification is contained in Section I.E of the Permit Analysis.

Weyerhaeuser also requests an update to the facility-wide hazardous air pollutant or HAP compliance equations and to incorporate the existing veneer lathe into the permit by assigning an emitting unit number and adding it to the emissions inventory. Further, because the facility is no longer a major source of HAPs, Weyerhaeuser requests removal of any veneer dryer conditions tied to 40 CFR 63, Subpart DDDD regulations applicable to major sources of HAPs. To ensure continued status as a minor source of HAPs, new permit conditions have been incorporated under the current permit action to require ongoing use and monitoring of the biofilter used to control VOCs and HAPs. **MAQP #2602-14** replaces MAQP #2602-13.

Section II: Limitations and Conditions

A. Facility-Wide Limits and Conditions

1. Weyerhaeuser shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, installed on or before November

23, 1968, that exhibit an opacity of 40% or greater averaged over 6 consecutive minutes (ARM 17.8.304).

2. Weyerhaeuser shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).

3. Weyerhaeuser shall not cause or authorize the production, handling, transportation, or storage of any material unless reasonable precautions to control airborne particulate matter are taken. Such emissions of airborne particulate matter from any stationary source shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.308).

4. Weyerhaeuser shall not process more than 850,000 tons of logs during any rolling 12-month time period (Board Order Montana SIP 15.2.5 and the 9/17/93 Stipulation).

5. Weyerhaeuser shall not exceed 10 tons during any rolling 12-month time period of any single HAP from the Sawmill and Plywood facilities combined. The following equation shall be used to calculate the single HAP emissions from the Sawmill and Plywood facilities combined (ARM 17.8.749):

   Single HAP tons = (SP MMBF *0.039437 tons/MMBF) + (PP MMSF 3/8"*0.032436 tons/MMSF 3/8")

   Where: SP = Sawmill Plant production as measured by amount of product processed by the Sawmill Kiln
   PP = Plywood Plant production as measured by amount of product processed by the Veneer Dryers
   MMBF = million board feet
   MMSF 3/8" = million square feet of plywood, 3/8-inch basis

6. Weyerhaeuser shall not exceed 25 tons during any rolling 12-month time period of combined HAPs from the Sawmill and Plywood facilities combined. The following equation shall be used to calculate the combined HAP emissions from the Sawmill and Plywood facilities combined (ARM 17.8.749):

   Combined HAP tons = (SP MMBF*0.108923 tons/MMBF) + (PP MMSF 3/8"*0.074552 tons/MMSF 3/8")

   Where: SP = Sawmill Plant production as measured by amount of product processed by the Sawmill Kiln
   PP = Plywood Plant production as measured by amount of product processed by the Veneer Dryers
   MMBF = million board feet
   MMSF 3/8" = million square feet of plywood, 3/8-inch basis

B. Individual Source Limits and Conditions

1. Riley Stoker Boiler

a. Emissions from the boiler shall be limited to 11.25 lb/hr of total particulate matter (ARM 17.8.752).

b. Emissions from the boiler shall be limited to 11.25 lb/hr of PM_{10} (ARM 17.8.752).

c. Visible emissions from the boiler shall be limited to 20% opacity (ARM 17.8.304).

d. Nitrogen oxide emissions from the boiler shall be limited to 104 lb/hr (ARM 17.8.752).

e. Carbon monoxide emissions from the boiler shall be limited to 506 lb/hr (ARM 17.8.752).

2. Veneer Dryers (2)

a. Weyerhaeuser shall operate and maintain a biofilter to control HAP emissions from the two veneer dryers (ARM 17.8.749)

b. Emissions from the two Veneer dryers shall be routed through biofilter and exhausted to the atmosphere through the biofilter stack (ARM 17.8.749).

c. Plywood veneer dryer emissions shall be limited to 12.60 lb/hr of total particulate (ARM 17.8.752).

d. Plywood veneer dryer emissions shall be limited to 12.60 lb/hr of PM_{10} (ARM 17.8.752).

e. Visible emissions shall be limited to 20% opacity (ARM 17.8.304).

3. Total Sawmill Process

a. Visible emissions shall be limited to 20% opacity from all sources included in the sawmill (ARM 17.8.304).

4. Total Planer Process – Replacement Baghouse

a. Emissions from the planer shavings bin baghouse shall be limited to 16.40 lb/hr of total particulate (Board Order Montana SIP 15.2.5 and the 9/17/93 Stipulation).

b. Emissions from the planer shavings bin baghouse shall be limited to 8.20 lb/hr of PM_{10} (Board Order Montana SIP 15.2.5 and the 9/17/93 Stipulation).

c. Emissions of PM and PM_{10} from the planer shavings bin baghouse shall not exceed 0.004 grains per dry standard cubic foot (gr/dscf) and 1.71 lb/hr (ARM 17.8.749 and ARM 17.8.752).

d. Emissions of $PM_{2.5}$ from the planer shavings bin baghouse shall not exceed 0.002 grains per dry standard cubic foot (gr/dscf) and 0.86 lb/hr (ARM 17.8.749).

e. Visible emissions shall be limited to 20% opacity from all sources included in the planer process (ARM 17.8.304).

f. Weyerhaeuser shall use a cyclone and a baghouse to control particulate emissions from the planer process (ARM 17.8.752).

5. Total Plywood Process Excluding the Dryers

a. Emissions from the plywood sander baghouse shall be limited to 6.17 lb/hr of total particulate (ARM 17.8.752).

b. Emissions from the plywood sander baghouse shall be limited to 6.17 lb/hr of PM_{10} (ARM 17.8.752).

c. Emissions from the sander dust silo baghouse shall be limited to 0.32 lb/hr of total particulate (Board Order Montana SIP 15.2.5 and the 9/17/93 Stipulation).

d. Emissions from the sander dust silo baghouse shall be limited to 0.32 lb/hr of PM_{10} (Board Order Montana SIP 15.2.5 and the 9/17/93 Stipulation).

e. Emissions from the sawline baghouse shall be limited to 0.89 lb/hr of total particulate (Board Order Montana SIP 15.2.5 and the 9/17/93 Stipulation).

f. Emissions from the sawline baghouse shall be limited to 0.89 lb/hr of PM_{10} (Board Order Montana SIP 15.2.5 and the 9/17/93 Stipulation).

g. Emissions from the dry fuel baghouse shall be limited to 0.86 lb/hr of total particulate (Board Order Montana SIP 15.2.5 and the 9/17/93 Stipulation).

h. Emissions from the dry fuel baghouse shall be limited to 0.86 lb/hr of PM_{10} (Board Order Montana SIP 15.2.5 and the 9/17/93 Stipulation).

i. Visible emissions shall be limited to 20% opacity from all sources included in the plywood process (ARM 17.8.304).

6. Dry Chip Cyclone and Baghouse

a. Emissions of PM and PM_{10} from the dry chip baghouse shall not exceed 0.004 gr/dscf and 0.86 lb/hr (ARM 17.8.752 and ARM 17.8.749).

b. Emissions of $PM_{2.5}$ from the dry chip baghouse shall not exceed 0.002 gr/dscf and 0.43 lb/hr (ARM 17.8.749).

7. Fugitive Dust from Haul Roads

a. Weyerhaeuser shall not cause or authorize to be discharged into the atmosphere from any access roads, parking lots, and log decks of the general plant property any visible fugitive emissions that exhibit opacity of 5% or greater averaged over 6 consecutive minutes (Board Order Montana SIP 15.2.5 and the 9/17/93 Stipulation).

b. Weyerhaeuser shall treat all unpaved portions of the haul roads, access roads, parking lots, and the general plant area with chemical dust suppressant as necessary to maintain compliance with the 5% opacity limitation (Board Order Montana SIP 15.2.5 and the 9/17/93 Stipulation).

c. Weyerhaeuser shall treat all log decks with water as necessary to maintain compliance with the 5% opacity limitation (Board Order Montana SIP 15.2.5 and the 9/17/93 Stipulation).

8. Boiler Fuel Storage and Handling.

Visible emissions shall be limited to 20% opacity from all sources included in boiler fuel storage and handling operations (ARM 17.8.308).

9. Medium Density Overlay (MDO) Process.

Visible emissions shall be limited to 20% opacity from all sources included in the MDO process (ARM 17.8.308).

10. Scarfing Line Process

a. Visible emissions shall be limited to 20% opacity from all sources included in the scarfing line process (ARM 17.8.308).

b. Emissions from the scarfing saw, the cutoff saw, and the small spot sander shall be controlled by the plywood sander baghouse (ARM 17.8.752).

11. Chip Bins

Weyerhaeuser shall use a cyclone to control emissions from the Chip Bins (ARM 17.8.752).

12. RDO 616 Screener

Weyerhaeuser shall limit operation of the RDO 616 Screener to 1,500 hours/year (ARM 17.8.749).

C. Testing Requirements

1. Weyerhaeuser shall conduct initial performance tests for total particulate matter, PM_{10} and opacity and demonstrate compliance with the Riley Stoker Boiler limitations in Sections II.B.1.a - c within 180 days of completion of the feed system modification. The testing and compliance demonstrations shall continue on an every 4-year basis. The tests shall conform to the methods and requirements of 40 CFR 60.8 and the Montana Source Test Protocol and Procedures Manual. Total particulate results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included (ARM 17.8.105).

2. Weyerhaeuser shall conduct initial performance tests for NO_x and CO concurrently and demonstrate compliance with the Riley Stoker Boiler limitations in Sections II.B.1.d and e within 180 days of completion of the feed system modification. The testing and compliance demonstrations shall continue on an every 4-year basis (ARM 17.8.105).

3. Source testing shall be conducted on the veneer dryers to demonstrate compliance with the limitations contained in Section II.B.2.a and b. The testing was performed on September 19, 1995, and shall continue on an every 3-year basis. Total particulate tests shall include an impinger (back-half) analysis. DEQ may allow a total particulate test only if the back-half is included and it is acknowledged that this test can be used as a surrogate for PM_{10} (ARM 17.8.105).

4. Source testing shall be conducted on the planer shavings bin baghouse to determine compliance with the limitations contained in Section II.B.4. An initial performance test of the replacement baghouse shall occur within 180 days of startup of the baghouse and shall continue on a once every three-years basis. Such testing shall include Method 201 and Method 202, or as otherwise approved in writing by DEQ. Weyerhaeuser may propose a discontinuance of $PM_{2.5}$ testing upon DEQ approval if testing results have sufficiently demonstrated emissions levels significantly below associated permit limits. Such proposal and approval shall be made in writing. A determination that the emissions levels are significantly below associated permit limits may occur if emissions testing results indicate actual emissions at 50% or less of $PM_{2.5}$ permit limits or multiple tests (at least 3) consistently

result in emissions that are 65% or less of $PM_{2.5}$ limits (ARM 17.8.749 and ARM 17.8.105).

5. Source testing shall be conducted on the plywood sander baghouse to demonstrate compliance with the limitations contained in Section II.B.5.a and b. The testing was performed on November 2 and 3, 1994, and shall continue on an every 3-year basis. DEQ may allow a total particulate test only if the back-half is included and it is acknowledged that this test can be used as a surrogate for PM_{10} (ARM 17.8.105).

6. Source testing shall be conducted on the Dry Chip Baghouse to determine compliance with the limitations contained in Section II.B.6. An initial performance test of the replacement baghouse shall occur within 180 days of startup of the baghouse and shall continue on a once every three-year basis. Such testing shall include Method 201 and Method 202, or as otherwise approved in writing by DEQ. Weyerhaeuser may propose a discontinuance of $PM_{2.5}$ testing upon DEQ approval if testing results have sufficiently demonstrated emissions levels significantly below associated permit limits. Such proposal and approval shall be made in writing. A determination that the emissions levels are significantly below associated permit limits may occur if emissions testing results indicate actual emissions at 50% or less of $PM_{2.5}$ permit limits or multiple tests (at least 3) consistently result in emissions that are 65% or less of $PM_{2.5}$ limits (ARM 17.8.749 and ARM 17.8.105).

7. All compliance source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).

8. DEQ may require further testing (ARM 17.8.105).

D. Control Equipment Performance Monitoring and Reporting

1. The appropriate performance parameters for the wet electrostatic precipitator (ESP) on the veneer dryers and the ESP on the boiler shall be monitored and recorded. These shall include the secondary voltage (volts, D.C.) and secondary current (amps). Each of the readings shall be recorded once per shift. Weyerhaeuser shall maintain these records on site for 3 years and shall submit the records to DEQ upon request (ARM 17.8.752).

2. The appropriate performance parameters for the biofilter on the veneer dryers shall be monitored and recorded. These shall include:

   a. the monitoring of biofilter temperature via redundant temperature sensors to maintain the 24-hour block biofilter bed operating temperature within the manufacturer's specified operating temperature range.

   b. Use a temperature sensor with a minimum accuracy of 4 degrees Fahrenheit (°F) or 0.75 percent of the temperature value, whichever is

larger.

c. Validate the temperature sensor's maximum operating temperature range by either following applicable procedures in the thermocouple manufacturer owner's manual or by permanently installing a redundant temperature sensor as close as practicable to the process temperature sensor.

d. In lieu of performing validation check, a new temperature sensor may be installed.

e. At least annually, inspect all components for integrity and all electrical connection for continuity, oxidation, and galvanic corrosion.

Weyerhaeuser shall maintain these records on-site for five (5) years and submit records to DEQ upon request (ARM 17.8.749).

2. Weyerhaeuser shall operate the following control equipment (Board Order Montana SIP 15.2.5 and the 9/17/93 Stipulation):

a.	Hog Fuel Boiler	ESP
b.	Two Veneer Dryers	ESP
c.	Sawmill Log Debarking	Water Sprays
d.	Plywood Log Debarking	Water Sprays
e.	Sawmill Chip Bin	Cyclone
f.	Planer Shavings Bin	Baghouse
g.	Plywood Fines	Cyclone
h.	Sanderdust Silo	Baghouse
i.	Sander Cyclone	Baghouse
j.	Sawline	Baghouse
k.	Dry Fuel	Baghouse
l.	Planer Shavings Loadout	Partial Enclosure

E. Operational Reporting Requirements

1. Weyerhaeuser shall supply DEQ with annual production information for all emission points, as required by DEQ in the annual emission inventory request. The request will include, but is not limited to, all sources of emissions identified in the emission inventory contained in the permit analysis, sources identified in Section I of this permit, and Section I.C. of the permit analysis.

Production information shall be gathered on a calendar-year basis and submitted to DEQ by the date required in the emission inventory request. This information may be used for calculating operating fees based on actual emissions from the facility and/or verifying compliance with permit limitations. Information shall be in the units as required by DEQ (ARM 17.8.505).

2. Weyerhaeuser shall supply DEQ with annual production information for the following emitting units (ARM 17.8.749):

Source	Units of material processed
Planer Shavings Bin	Tons of planer shavings handled
Block Saws	Tons of logs
Debarkers	Tons of logs
Fines Bin	Tons of fines handled
Chip Bins	Tons of chips handled
Veneer Dryer	10^4 ft^2 of veneer processed, 3/8" basis
Lumber Dry Kilns	MBF
Sander Dust Silo	Tons of sander dust handled
Fuel Bunker	Tons of fuel (wood waste) handled
Dry Fuel Baghouse	Tons of fuel (wood waste) handled
Riley Stoker Boiler	Tons of fuel (wood waste and sander dust) handled
Plywood Sawline and Sander	ft^2 of plywood through sawline and sander, 3/8" basis

3. Weyerhaeuser shall provide the hours of operation for the following sources (ARM 17.8.749):

Sawmill
Planer
Planer Baghouse
Dry Chip Baghouse
Plywood Mill
Veneer Dryer
Riley Stoker Boiler
RDO 616 Screener

4. Weyerhaeuser shall provide the total miles traveled for each vehicle type (ARM 17.8.749).

5. Weyerhaeuser shall provide the following information regarding fugitive dust control for haul roads and general plant area (ARM 17.8.749):

   a. Hours of operation of water trucks.

   b. Application schedule for chemical dust suppressant if applicable.

   Weyerhaeuser shall document, by month, the total tons of logs processed at the facility. By the 25th day of each month, Weyerhaeuser shall total the tons of logs processed during the previous 12 months to verify compliance with the limitation in Section II.A.4. A written report of the compliance verification shall be submitted along with annual emission inventory (ARM 17.8.749).

6. Weyerhaeuser shall document, by month, the total amount of product (in million square feet, 3/8-inch basis) processed by the Veneer Dryers. By the 25th day of each month, Weyerhaeuser shall total the square feet of product processed by the Veneer Dryers during the previous 12 months to verify compliance with the limitations in Section II.A.5 and Section II.A.6. A written report of the compliance verification shall be submitted along with annual emission inventory (ARM 17.8.749).

7. Weyerhaeuser shall document, by month, the total amount of product (in million board feet) processed by the Sawmill Kiln. By the 25th day of each month, Weyerhaeuser shall total the board feet of product processed by the Sawmill Kiln during the previous 12 months to verify compliance with the limitations in Section II.A.5 and Section II.A.6. A written report of the compliance verification shall be submitted along with annual emission inventory (ARM 17.8.749).

F. Notification

Weyerhaeuser shall provide DEQ with written notification of the following dates within the specified time periods:

1. Pre-test information must be completed and received by DEQ no later than 25 working days prior to any proposed test date according to the Montana Source Test Protocol and Procedures Manual (ARM 17.8.105).

2. DEQ must be notified of any proposed test date 10 working days before that date according to the Montana Source Test Protocol and Procedures Manual (ARM 17.8.105).

Section III: General Conditions

A. Inspection – Weyerhaeuser shall allow DEQ's representatives access to the source at all reasonable times for the purpose of making inspections or surveys, collecting samples, obtaining data, auditing any monitoring equipment (CEMS, CERMS) or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.

B. Waiver – The permit and the terms, conditions, and matters stated herein shall be deemed accepted if Weyerhaeuser fails to appeal as indicated below.

C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving Weyerhaeuser of the responsibility for complying with any applicable federal or Montana statute, rule or standard, except as specifically provided in ARM 17.8.740, *et seq.* (ARM 17.8.756).

D. Enforcement – Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties or other enforcement action as specified in Section 75-2-401, *et seq.*, MCA.

E. Appeals – Any person or persons jointly or severally adversely affected by DEQ's decision may request, within 15 days after DEQ renders its decision, upon affidavit setting forth the grounds therefor, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay DEQ's decision, unless the Board issues a stay upon receipt of a petition and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of DEQ's decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the Board, DEQ's decision on the application is final 16 days after DEQ's decision is made.

F. Permit Inspection – As required by ARM 17.8.755, Inspection of Permit, a copy the air quality permit shall be made available for inspection by DEQ at the location of the source.

G. Permit Fee – Pursuant to Section 75-2-220, MCA, failure to pay the annual operation fee by Weyerhaeuser may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.

H. Duration of Permit – Construction or installation must begin or contractual obligations entered into that would constitute substantial loss within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall expire (ARM 17.8.762).

Montana Air Quality Permit (MAQP) Analysis
Weyerhaeuser NR Company
Kalispell Facility
MAQP #2602-14

I. Introduction/Process Description

A. Site Location

The Weyerhaeuser NR Company – Kalispell facility (Weyerhaeuser) is located approximately 3 miles northeast of Kalispell, Montana, near the Evergreen subdivision in the SW ¼ of Section 33, Township 29 North, Range 21 West, in Flathead County. The nearest Class I area is Glacier National Park, located approximately 16 miles northeast of Weyerhaeuser's existing plant. Other nearby Class I areas which may be of concern are the Flathead Indian Reservation, approximately 25 miles south, and the Bob Marshall Wilderness, approximately 43 miles southeast. Weyerhaeuser's plant is located within the boundaries of the Kalispell PM_{10} nonattainment area.

B. Source Description

Weyerhaeuser currently operates an existing plywood plant near the Evergreen subdivision in Kalispell, Montana. The process of making plywood is as follows: Raw logs are cut to desired lengths, debarked, and peeled into thin uniform veneers. The veneers are then transported to the veneer dryers where they are dried. Indirect heat for the two veneer dryers is supplied by the Riley Stoker boiler. The maximum capacity of the two veneer dryers is a combined 30,000 ft^2 per hour of veneer @ 3/8". After drying, the veneer is sorted and sent to the lay-up operation where it is assembled in various layers. A plywood panel is formed by applying resin to the veneer layers then pressing the veneer layers under heat. The plywood is then trimmed and sanded. The Riley Stoker boiler is fueled with hogged wood waste and sander dust. The steam capacity of the Riley Stoker boiler is 140,000 lb/hour (MAQP #2606-07). The boiler stack is 6.5 feet in diameter and 100 feet in height. The particulate control device on the boiler has been a wet scrubber. An electrostatic precipitator (ESP) was added in 1992 to satisfy a consent decree.

C. Permitted Process and Control Equipment:

1. Riley Stoker Boiler - with a design input capacity of 225 million Btu/hr. This is based on a maximum steam output rate of 140,000 lb steam/hr. This boiler is controlled with an ESP.

2. Veneer Dryers (2) - with a combined capacity of 30,000 square feet of 3/8" veneer per hour. This equals 937.5 cubic feet of wood per hour. The density of the wood is estimated at 47.6 lb/cubic foot at 66% moisture. The maximum process rate is then 22.31 ton/hr. These dryers are controlled with a GeoEnergy E-Tube wet ESP.

3. Total Sawmill Process - This process includes all point source emissions from the chip bin cyclone. Fugitive sources are log debarking, log sawing, chip screen, chip bin loadout, and sawmill building vents.

4. Total Planer Process - This process includes all point source emissions from the shavings cyclone/baghouse. Fugitive emissions are planer shavings bin, dry chip target box, chipper and chip screen process.

5. Total Plywood Process Excluding the Veneer Dryers - This process includes all point source emissions from the fines cyclone, sander dust silo baghouse, sander dust baghouse, sawline baghouse, and dry fuel baghouse. Fugitive sources include the debarker, block saw, lily pad chipper, chip screen, chip bin loadout, and green stackers.

6. Lumber Kilns - This process includes the emissions from the drying process.

7. Mobile Source Fugitive Emissions - This process includes all particulate emissions from mobile vehicle activity on company property, as well as the gaseous emissions from the gasoline and diesel engines used in these vehicles.

8. Boiler Fuel Storage and Handling - This process includes fugitive particulate emissions from the bark hog, bark belt, fuel bunker, overs conveyor, and the fuel pile.

9. RDO 616 Screener – This process includes fugitive particulate emissions from bark, rock, and sawdust separation.

10. Medium Density Overlay (MDO) Process - This process will produce a plywood panel that has kraft paper glued onto one or both of its faces. The process equipment for the MDO process line is a heat press and a trim saw.

11. Scarfing Line Process - This process will glue plywood panels together to make long panels. The equipment for the scarfing line is the scarfing saw, the cutoff saw, and the small spot sander, which is tied into the existing plywood sander baghouse system.

D. Permit History

The plywood plant near the Evergreen subdivision in Kalispell, Montana has operated since the late 1970s when Plum Creek Manufacturing (Plum Creek) purchased the facility from C & C Plywood Corp. The facility included an existing boiler, two veneer dryers, a plywood mill, a sawmill, and existing equipment not covered by an air quality permit. **MAQP #1752** was initially issued for operation of the Riley Stoker boiler on April 29, 1983. Plum Creek was merged with Weyerhaeuser in 2016, with the facility changing names to Weyerhaeuser.

MAQP #2601 was issued to Plum Creek on October 13, 1989, for an increase of the Riley Stoker boiler capacity.

MAQP #2602-01 was issued to Plum Creek on September 25, 1992, for the following reasons:

1. To consolidate all of the source's existing permits into a single permit. This modification placed all air quality permit requirements in a single document.

2. As the result of the settlement of enforcement actions (Consent Decree, Stipulation, and Order - Cause No. DV 90-114B, and Cause No. DV 91-313B, Eleventh District Court, Flathead County, Montana) taken by the Department of Environmental Quality (Department), Plum Creek agreed to install new control systems on the Riley Stoker boiler and the veneer dryers. The modification of MAQP #2602 was done to document the installation of the new systems. Plum Creek was required to permanently derate the Riley Stoker boiler back to the 100,000 lb steam/hr which was the level it was operating at prior to issuance of MAQP #2602.

   a. Veneer Dryers

      Plum Creek installed the GeoEnergy E-Tube wet ESP as the control device for the veneer dryers. The E-Tube collects the dust particles from conditioned dirty gas by ionizing the gas with disc electrodes contained in a collection tube. The charged particles are collected on the walls of the tube, along with entrained water droplets. The water film helps to clean the collection tube, along with a periodic flush from the top. The residue collected from the flushing of the system can be utilized by adding it to the hog fuel supply system.

   b. Riley Stoker Boiler

      Plum Creek installed an ESP as the control device for the boiler. The ESP was installed downstream of a mechanical collector and an induced draft fan. Design requirements for the ESP include a maximum gas flow of 139,000 ACFM, normal exit gas temperature of 500°F, and an emergency exit gas temperature of 750°F. Design pressure extremes require a ± 15" w.c. and the inlet dust loading design value, under extreme conditions, was limited to 1.0 gr/dscf. Stack gas design velocity is 3,000 to 3,500 feet per minute.

3. The 1990 Clean Air Act Amendments require the application of Reasonably Available Control Measures (RACM) to sources located in or significantly impacting moderate PM_{10} nonattainment areas. RACM was defined as Reasonably Available Control Technology (RACT) for existing PM_{10} stack or point sources, process fugitives, and fugitive dust sources such as haul roads, open stockpiles, disturbed areas, or unpaved staging areas (see "Guidance on Reasonably Available Control Requirements in Moderate PM_{10} Nonattainment Areas"). DEQ required that Plum Creek apply RACT to all applicable sources at the Evergreen plywood plant and required Plum Creek to modify the existing air quality permit (MAQP #2602) to include the

RACT requirements as enforceable permit conditions.

4. DEQ, as part of its control strategy development for the Kalispell PM_{10} State Implementation Plan (SIP), determined it was necessary to establish enforceable allowable emission limitations for all existing major sources located in the non-attainment area. The modifications made to MAQP #2602 established those allowable emission limitations. MAQP #2602-01 replaced MAQP #2600.

MAQP #2602-02 was issued to Plum Creek on September 20, 1993, to install and operate a Clarke log yard residue reclaim system at the Evergreen plywood plant.

The operation of the Clarke log yard residue reclaim system allowed Plum Creek to recycle log yard debris that was previously trucked to an on-site landfill. Debris is separated into wood waste, soil, and rock fractions. Reclaimed wood waste is taken to the hog fuel pile and burned. The soil and wood fiber fines may be used for landscaping purposes. Rock and gravel separated from the waste material is returned to the log yard. Overall environmental benefits from the project included reduction of material disposed of in the landfill, more rock in the log yard to reduce fugitive dust, and less haul traffic from the log yard to the off-site landfill. MAQP #2602-02 replaced MAQP #2602-01.

Plum Creek was issued **MAQP #2602-03** on June 6, 1994, for the construction and operation of a new sanderdust baghouse and a remanufacturing facility at the Evergreen facility. The new baghouse was necessary because the old sander at the plywood plant was replaced with a new sander. The new sander has more heads that will create a smoother surface and improve the quality of the plywood. The new baghouse is larger and can handle the larger airflow that will result from the new sander. There was an increase in particulate emissions from the new baghouse.

The remanufacturing plant processes low quality scrap lumber from the sawmill and manufacture moldings. The scrap lumber is sized in the remanufacturing plant with the larger pieces being remanufactured into moldings. The smaller pieces are sent to a chipper and sold as wood chips.

The larger scrap lumber is finger jointed and glued to extend the length of the scrap wood. The finger jointed scrap is then cut and molded into shape. Waste from the finger jointer, saw, and molder is used as fuel for the hog fuel boiler.

The waste stream from the chipper is transported pneumatically from the chipper to a cyclone. The cyclone separates the chips for deposit in the truck bin. The chipper cyclone exhaust is sent to a new fabric filter baghouse. The exhaust from the finger jointer, saw, and molder is also transported pneumatically to a cyclone. The cyclone separates the wood particles for deposit in a truck bin for use as fuel in the hog fuel boiler. The cyclone exhaust from the finger jointer cyclone is vented to the same baghouse as the chipper cyclone exhaust.

To offset the increase in particulate emissions from the sander baghouse, remanufacturing baghouse, and chip bin, Plum Creek proposed to reduce the

enforceable emission rate from the veneer dryers. As mentioned above, a consent decree required Plum Creek to install an ESP on the veneer dryers (MAQP #2602-01) to meet their opacity limit. With the installation of the ESP there was also a reduction of actual particulate emissions. This reduction of actual emissions was sufficient to offset this proposed increase in emissions.

In addition to the above-mentioned changes, Plum Creek officially requested that the conditions of MAQP #2602-02 for the Evergreen facility be modified to reflect the limitations and conditions contained in the 9/17/93 Stipulation. MAQP #2602-03 replaced MAQP#2602-02.

Plum Creek was issued **MAQP #2602-04** on February 25, 1995, for the construction and operation of a Medium Density Overlay (MDO) process line and a scarfing line at their Evergreen facility. The MDO process line produces a plywood panel that has kraft paper glued onto one or both of its faces. The process equipment for the MDO process line includes a heat press and a trim saw. There was not an increase in production because of the MDO process, but rather panels from other reduced product lines will be used. An increase in particulate matter emissions was not expected because the panels to be used in the MDO process are normally trimmed at the facility as part of the plywood process. The MDO process resulted in an increase in VOC emissions of approximately 0.038 tons/year from the glue that is used in this process.

The scarfing line process glues plywood panels together to make long panels. The process equipment installed for the scarfing line process included the scarfing saw, the cutoff saw, and the small spot sander, which was tied into the existing plywood sander baghouse system. The scarfing line did not result in an increase in production because the plywood panels that are used in the scarfing line are produced elsewhere in the plant. The scarfing line did not result in an increase in particulate matter emissions because the panels to be used in the scarfing line are normally sawed and sanded at the facility as part of the plywood process. In addition, the total air flow of the plywood sander baghouse was still less than the current design air flow of 72,000 acfm at a permitted emission rate of 6.17 lb/hr. The scarfing line resulted in an increase in VOC emissions of 0.006 tons/year from the glue that is used in this process. MAQP #2602-04 replaced MAQP #2602-03.

Plum Creek was issued **MAQP #2602-05** on June 4, 1995, to replace the existing Clarke log yard residue reclaim system with a new Rawlings log yard residue reclaim system. The new system included a reclaimer, conveyors, classifiers, a trommel screen, and rock and metal separators (RMS). This system is powered by a 340 hp diesel engine. The Rawlings system is slightly larger than the Clarke system and resulted in an increase in TSP emissions of 0.29 tons/year and in an increase in PM_{10} emissions of 0.75 tons/year. Because Plum Creek's facility is located in a PM_{10} nonattainment area and there would be an increase in PM_{10} emissions, the operation of the Rawlings system was limited to 2940 hours/year of operation during the months of April through November. MAQP #2602-05 replaced MAQP #2602-04.

MAQP #2602-06 removed specific hourly emission limits from the following sources:

Sawmill Chip Bin Cyclone
Plywood Fines Cyclone
Remanufacturing Jointer Bin
Remanufacturing Chipper Bin

As part of the Kalispell PM_{10} State Implementation Plan (SIP), emission limits were placed on various sources of emissions at the facility. In many cases, these limits were equal to the potential-to-emit (PTE) of the source.

The Title V Operating Permit Program imposes different requirements on a facility depending on whether a particular source is considered significant or insignificant. If the specific emission limits were not an applicable requirement for the units listed above, they would be considered insignificant sources because of their size and function. Plum Creek suggested, and DEQ agreed, that the limits on the above sources were meaningless because they equal the PTE of the units and, by definition, the sources were not capable of emission rates in excess of the limits. This permitting action did not increase either actual or allowable emissions from the facility. MAQP #2602-06 replaced MAQP #2602-05.

MAQP #2602-07 was issued on February 15, 1997, and authorized an increase in the hog fuel boiler steaming capacity and tons of logs debarked at the facility as well as the installation of an air knife separator in the log yard residue reclaimer. The permitting action was subject to the review requirements of the New Source Review (NSR) Prevention of Significant Deterioration (PSD) program for NO_X and CO. Plum Creek "netted out" of PSD review for PM and PM_{10}.

The increase in steaming capacity of the boiler was needed during the winter months to provide heat for new building space as well as steam for recently installed processes such as the medium density fiberboard (MDF) facility. Plum Creek was limited to 100,000 lb of steam/hour from the hog fuel boiler and requested that this limit be increased to 140,000 lb/hour. Along with this change Plum Creek requested a decrease in allowable particulate emissions from the hog fuel boiler.

The increase in the log tonnage was needed to offset increasingly heavier wood. A decrease in the amount of salvage timber caused the average density of the logs received at the facility to increase. The previous limit on the tons of logs debarked was proposed by Plum Creek during the development of the Kalispell PM_{10} SIP and was meant to allow the mill to operate at full capacity. Plum Creek determined that because of the increased log density, the production allowed by the previous debarking limit was inadequate. Plum Creek requested that the limit be increased from 734,400 tons of logs/year to 850,000 tons/year.

The changes in allowable emissions from the facility associated with this permitting action were as follows:

PM - 18.0 tons/year decrease
PM_{10} - 22.9 tons/year decrease

NOx - 128.4 tons/year increase
CO - 628.2 tons/year increase
SO_2 - 2.0 tons/year increase
VOC - 6.3 tons/year increase

These changes in allowable emissions were different from the net emissions increases used to determine if the Major NSR/PSD programs were applicable (Section II.E and II.F of MAQP Analysis #2602-07). The net emissions increase for PSD and NSR applicability are based on the difference between past actual emissions and future potential emissions and not the change in allowable emissions. MAQP #2602-07 replaced MAQP #2602-06.

On May 30, 2002, DEQ received a complete NSR/PSD permit application for the historical 1989 Small Log Sawmill (SLS) project at the Plum Creek facility. The Plum Creek facility was a major source of emissions as defined under the NSR program at the time of the SLS project. Further, at the time of the SLS project, the Evergreen area was designated attainment/unclassified for all pollutants. On November 15, 1990, the area was re-designated as a PM_{10} nonattainment area, and DEQ was required to develop a SIP to bring the area back into compliance with the National Ambient Air Quality Standards (NAAQS) for PM_{10}. Because the Evergreen area was considered attainment or unclassified for all pollutants at the time of the SLS project an NSR/PSD permit review was required rather than an NSR Nonattainment Area (NAA) permit review.

Under the permit action, emissions of all regulated pollutants were compared to NSR/PSD significant emission rate (SER) thresholds to determine if NSR/PSD review was required. Under the NSR/PSD program, a change to an existing major source is considered to be a major modification requiring NSR/PSD review if the emissions increase resulting from the modification is greater than the SER for any pollutant. Total potential SLS emissions increases and the NSR/PSD SERs for the 1989 SLS project were contained in the table below.

Small Log Sawmill Total Emission Increase		
Pollutant	**Increase (tons/year)**	**NSR/PSD SERs (tons/year)**
PM	125.00	25
PM_{10}	83.70	15
CO	170.00	100
NOx	18.70	40
SO2	1.50	40
VOC	22.70	40
Lead	0.00	0.6

As indicated in the table above, the SLS project resulted in net emissions increases exceeding the applicable SER for PM, PM_{10}, and CO; therefore, NSR/PSD review applied to these pollutants under the permit action. NSR/PSD review was conducted for CO emissions, including Riley Stoker Boiler emissions, under MAQP #2602-07; therefore, NSR/PSD review for CO was not required for the permit action, because it had already been satisfied. However, the appropriate review for PM and PM_{10} was not done at that time.

As part of NSR/PSD review a source is required to demonstrate compliance with the NAAQS and Montana Ambient Air Quality Standards (MAAQS) and all applicable Class I and Class II increments through air dispersion modeling for all applicable pollutants. However, because the Evergreen area has, since construction and initial operation of the SLS project, been covered under a SIP incorporating a control plan and limits for PM/PM_{10} emission sources in the area (including the Plum Creek facility) DEQ determined that air dispersion modeling for the SLS project was not required.

The NSR/PSD rules also require that each major source and/or major modification must employ Best Available Control Technology (BACT) for each pollutant for which a new source or modification is considered major. BACT was applied on a pollutant-by-pollutant basis to each physically modified emission unit that experienced an emission increase of the pollutant of concern as a result of the project. The affected emitting units in the permit action included 5 saws, the planer, chip bins, chippers, and the sawmill lumber dry kilns. A particulate matter BACT analysis for the SLS project was contained in Section IV of the permit analysis. A CO BACT analysis was not required for the permit action because CO emissions result from Riley Stoker Boiler operations. The Riley Stoker Boiler was not modified as part of the SLS project; therefore, emissions from the Riley Stoker Boiler were considered secondary or associated emissions and BACT review was not required.

Further, the retroactive NSR/PSD action also accounted for the increase in CO emissions associated with the historical 1995 Veneer Dryer Control Project (Veneer Dryer Project). Although CO emissions were directly associated with the Riley Stoker Boiler and did not result from operation of the Veneer Dryers themselves, the Veneer Dryer Project de-bottlenecked the plywood process and increased steam production from the Riley Stoker Boiler. Therefore, CO emissions from the Riley Stoker Boiler were considered in the analysis for the Veneer Dryer Project. **MAQP #2602-08** replaced MAQP #2602-07.

On January 22, 2014, DEQ received correspondence from Plum Creek to include federally enforceable limits to reduce the maximum production capacities of both the plywood production process and the sawmill kiln. Accepting these new limits reduced Plum Creek's HAP emissions to below the major source threshold and the Evergreen Complex became a minor (area) source of HAPs. As such, Plum Creek would be subject to the recently promulgated National Emission Standards for Hazardous Air Pollutants of 40 CFR 63 Subpart JJJJJJ rather than 40 CFR 63 Subpart DDDDD for boilers and process heaters at major sources of HAP. The Subpart DDDDD compliance date was January 31, 2015. Therefore, in accordance with EPA's guidance document "Potential to Emit for MACT Standards - - Guidance on Timing Issues", becoming an area source before the compliance date of the MACT allowed Plum Creek to limit emissions to area source levels and avoid the Subpart DDDDD requirements.

In order to become an area source of HAPs, Plum Creek requested that the permitted capacity of two production processes be lowered. The plywood production was reduced from 227,760 thousand ft^2 3/8" per year of product to

180,000 thousand ft^2 3/8" per year. The Sawmill Kiln was reduced from 105,000 thousand board feet per year of product to 80,000 thousand board feet per year. The boiler capacity and plywood production remained unchanged as part of this modification. The permit format was updated to reflect the current DEQ air quality permit format at the time. **MAQP #2602-09** replaced MAQP #2602-08.

On December 9, 2016, DEQ received from Weyerhaeuser notification that this facility became a wholly owned subsidiary of Weyerhaeuser. As of the end of 2016, Plum Creek Manufacturing was fully absorbed and the company name changed to Weyerhaeuser. **MAQP #2602-10** replaced MAQP #2602-09.

On July 26, 2017, DEQ received from Weyerhaeuser a concurrent application to modify the MAQP and the Title V permit for this facility. Weyerhaeuser sought to replace a cyclone and baghouse at the sawmill planer, modify the plywood plant dry waste wood air system, and modify production limits on the Plywood Plant and Sawmill in a manner that would continue to maintain emissions of Hazardous Air Pollutants to below major source thresholds, and also would maintain a synthetic minor status with respect to the Maximum Achievable Control Technology (MACT) rules applicable to boilers. The permit was also updated to reflect the shutdown and dismantling of the remanufacturing facility.

DEQ received the application fee and an affidavit of publication of public notice on August 30, 2017.

As a major stationary source as defined in ARM 17.8, the project related emissions increases were reviewed against the significant emissions rates and the project was determined to not trigger the requirements of the Prevention of Significant Deterioration program. The requirements of ARM 17.8 Subchapter 7, including Best Available Control Technology review, were fulfilled and appropriate emissions limitations associated with the facility changes established. Further, the permit action represented a reduction of allowable emissions. **MAQP #2602-11** replaced MAQP #2602-10.

On September 12, 2019, DEQ received an application from Weyerhaeuser to modify the production limits for the Plywood and Sawmill facilities to allow for more flexibility while still maintaining an area source status for Hazardous Air Pollutant (HAP) emissions. The Plywood Facility previously had a production limit of 175 million feet^2 of 3/8 inch per year (MMSF 3/8") and the Sawmill Facility had a production limit of 100 million board feet per year (MMBF). These production limits ensured that the Evergreen facility stayed below Major Source thresholds for HAP emissions. Weyerhaeuser proposed a sliding production scale in which the two facilities would adjust production in concert (if one facility's production is high, the other will decrease production) and still maintain area source status.

The Evergreen plywood plant is a major stationary source as defined in ARM 17.8; therefore, any criteria pollutant emission change that would occur because of an increase in allowable production levels must be evaluated in the context of Prevention of Significant Deterioration (PSD). The PSD applicability analysis determines if there is any significant increase in any criteria pollutant by reviewing

the project-related emissions increases against the significant emissions rates. Weyerhaeuser provided this analysis, and it was determined to not trigger additional requirements of the PSD program. **MAQP #2602-12** replaced MAQP #2602-11.

On March 22nd, 2023, DEQ received a request from Weyerhaeuser to replace the previously permitted Clark Log Yard Reclaim System with an RDO 616 Screener. The screener will separate the constituents: bark, rock, and sawdust.

The primary considerations for emissions are total particulate matter (PM) and total particulate matter below 10 microns (PM10). Weyerhaeuser submitted screener flow rate, estimated usage hours, and volumetric percentages of constituents. Based on these inputs, DEQ determined the total PM = 4.0 tpy and the total PM_{10} = 1.4 tpy. These values fall well below the values for the Clark Log Yard Reclaim System of total PM = 7.5 tpy and total PM_{10} = 3.2 tpy, as calculated in MAQP #2602-02.

Detailed calculations can be found in Section III. Emission Inventory. Weyerhaeuser shall report hours of operation of the RDO 616 Screener, not to exceed 962 hours per year. **MAQP #2602-13** replaced MAQP #2602-12.

E. Current Permit Action

On October 24, 2025, DEQ received an application from Weyerhaeuser to increase the allowable operating hours of the RDO 616 Screener from 962 to 1,500 hours per year, pushing the potential to emit (PTE) for particulate matter (PM) over the 5 tons per year de minimis threshold. Pursuant to ARM 17.8.745(2), Weyerhaeuser initially amended their permit by limiting the RDO Screener to 962 hours of operation to ensure particulate matter (PM) emissions increases did not exceed the de minimis threshold, thereby avoiding the requirement for a permit modification. The incremental increase in PM emissions resulting from the proposed additional 538 hours of operation (1,500 hrs/yr – 962 hrs/yr) is also less than the de minimis threshold. However, in total, PM emissions from RDO 616 Screener operations at 1,500 hrs/year exceeds 5 tpy. Pursuant to ARM 17.8.745 (1)(a)(iv), any construction or improvement project with a PTE more than 5 tpy may not be artificially spilt into smaller projects to avoid permitting. Therefore, the proposed increase in RDO 616 Screener operating hours does not comply with the de minimis rule, and the current permit modification is required to accommodate the requested change in operations.

Weyerhaeuser also requests an update to the facility-wide hazardous air pollutant or HAP compliance equations and to incorporate the existing veneer lathe into the permit by assigning an emitting unit number and adding it to the emissions inventory. Further, because the facility is no longer a major source of HAPs, Weyerhaeuser requests removal of any veneer dryer conditions tied to 40 CFR 63, Subpart DDDD, regulations applicable to major sources of HAPs. To ensure continued status as a minor source of HAPs, new permit conditions have been incorporated under the current permit action to require ongoing use and monitoring of the biofilter used to control VOCs and HAPs.

The Kalispell facility is a major stationary source as defined in ARM 17.8.801; therefore, any criteria pollutant emission change that would occur because of an

increase in allowable production levels must be evaluated in the context of Prevention of Significant Deterioration (PSD). The PSD applicability analysis determines if there is any significant increase in any criteria pollutant by reviewing the project-related emissions increases against the significant emissions rates. It was determined the current permit action does not trigger the additional requirements of the PSD program. **MAQP #2602-14** replaces MAQP #2602-13.

F. Response to Public Comments

Person/Group Commenting	Permit Reference	Comment	DEQ Response
Landau Associates (on behalf of Weyerhaeuser)	Facility Name	Weyerhaeuser requested to change the facility name from "Evergreen Facility" to "Kalispell Facility"	Thank you for the comment. The naming of the facility has been changed.
	Section II. F.3.	Weyerhaeuser requested removal of the condition. This condition was added in 2017 due to replacement of a cyclone and baghouse at the sawmill planer	Thank you for the comment. The condition has been removed since the notifications associated with the new baghouses from 2017 have been fulfilled.
	Permit Analysis II. E. 5.	Incorrectly states the public notice affidavit was posted on October 16, 2019	Thank you for the comment. The date has been updated to reflect the actual date of publication October 31, 2025.
	Permit Analysis IV. EI Table	Add the RDO 616 Screener to the emission inventory table separate from the "Log Debarking" and update Total Emissions	Thank you for the comment. The RDO 616 Screener has been added to the Emissions inventory table and Total Emissions have been updated
	Permit Analysis IV. HAP Summary Table and HAP Emissions Inventory	Add the Veneer Lathe to the HAP Summary and HAP Emissions Inventory and associated emissions	Thank you for the comment. The Veneer Lathe HAP emissions have been added to both tables
	Permit Analysis IV. Sliding Production Scale Calculations	Update Max multi HAP values to reflect current conditions	Thank you for the comment. The Max Multi HAP totals have been updated
	Permit Analysis IV. Sliding Production Scale Calculations assumptions	Updated the Veneer Dryer's Biofilter assumed control percentages to reflect the stated control percentages in the Emissions Inventory Table	Thank you for the comment. The assumed control percentages have been updated.
	Permit Analysis IV. RDO 616 Screener Emissions Calculations	Add a footnote to the calculations expressing the "Emissions summarized below do not include minor emissions from the engine and storage tank associated with the RDO 616 Screener"	Thank you for the comment. The footnote has been added.

G. Additional Information

Additional information, such as applicable rules and regulations, BACT/RACT determinations, air quality impacts, and environmental assessments, is included in the analysis associated with each permit or change to the permit.

II. Applicable Rules and Regulations

The following are partial quotations of some applicable rules and regulations, which apply to the facility. The complete rules are stated in the Administrative Rules of Montana (ARM) and are available upon request from DEQ. Upon request, DEQ will provide references for locations of complete copies of all applicable rules and regulations or copies where appropriate.

A. ARM 17.8, Subchapter 1 – General Provisions, including but not limited to:

1. ARM 17.8.101 Definitions. This rule includes a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.

2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of DEQ, provide the facilities and necessary equipment (including instruments and sensing devices, and shall conduct tests, emission or ambient, for such periods of time as may be necessary using methods approved by DEQ.

3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by DEQ, any source or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Clean Air Act of Montana, 75-2-101, *et seq*., Montana Code Annotated (MCA).

   Weyerhaeuser shall comply with the requirements contained in the Montana Source Test Protocol and Procedures Manual, including, but not limited, using the proper test methods and supplying the required reports. A copy of the Montana Source Test Protocol and Procedures Manual is available from DEQ upon request.

4. ARM 17.8.110 Malfunctions. (2) DEQ must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation or to continue for a period greater than 4 hours.

5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means that, without resulting in reduction of the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be

operated or maintained in such a manner as to create a public nuisance.

B. ARM 17.8, Subchapter 2 – Ambient Air Quality, including, but not limited to the following:

1. ARM 17.8.204 Ambient Air Monitoring
2. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide
3. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
4. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
5. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
6. ARM 17.8.221 Ambient Air Quality Standard for Visibility
7. ARM 17.8.222 Ambient Air Quality Standard for Lead
8. ARM 17.8.223, Ambient Air Quality Standard for PM_{10}.

Weyerhaeuser must maintain compliance with the applicable ambient air quality standards.

C. ARM 17.8, Subchapter 3 – Emission Standards, including but not limited to:

1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.

2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rule requires an opacity limitation of 20% for all fugitive emission sources and that reasonable precautions be taken to control emissions of airborne particulate matter. (2) Under this rule, Weyerhaeuser shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.

3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause, allow or permit to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this rule.

4. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause, allow or permit to be discharged into the atmosphere particulate matter in excess of the amount set forth in this rule.

5. ARM 17.8.340 New Source Performance Standards. This rule incorporates, by reference, 40 CFR 60, Standards of Performance for New Stationary Sources (NSPS). This facility is not an NSPS affected source because it does not incorporate any equipment meeting the definition of an NSPS affected unit contained in any subpart.

   Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units is not applicable to the Riley Stoker Boiler. The boiler was constructed prior to June 19, 1984, and all subsequent boiler upgrades have not constituted a modification or reconstruction of the

unit triggering NSPS requirements.

6. ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. The source, as defined and applied in 40 CFR Part 63, shall comply with the requirements of 40 CFR Part 63, as listed below:

   40 CFR 63, Subpart A – General Provisions apply to all equipment or facilities subject to a NESHAP Subpart as listed below:

   40 CFR 63, Subpart JJJJJJ – Standards for Industrial, Commercial, and Institutional Boilers at Area Sources. Weyerhaeuser has established limitations which maintain the facility as a minor source of emissions with respect to HAPs. As such, this Subpart is applicable to Weyerhaeuser.

D. ARM 17.8, Subchapter 5 – Air Quality Permit Application, Operation and Open Burning Fees, including, but not limited to:

1. ARM 17.8.504 Air Quality Permit Application Fees. This rule requires that an applicant submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to DEQ. DEQ received the required application fee on September 12, 2019.

2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to DEQ by each source of air contaminants holding an air quality permit (excluding an open burning permit) issued by DEQ. The air quality operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

   An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, described above, shall take place on a calendar-year basis. DEQ may insert into any final permit issued after the effective date of these rules, such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions that prorate the required fee amount.

E. ARM 17.8, Subchapter 7 – Permit, Construction and Operation of Air Contaminant Sources, including, but not limited to:

1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.

2. ARM 17.8.743 Montana Air Quality Permits –When Required. This rule requires a facility to obtain an air quality permit or permit modification if they construct, modify or use any air contaminant sources that have the potential to emit greater than 25 tons per year of any pollutant. Weyerhaeuser has the potential to emit more than 25 tons per year of PM, PM_{10}, NO_X, CO,

and VOC; therefore, an air quality permit is required.

3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit program.

4. ARM 17.8.745 Montana Air Quality Permits--Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.

5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements. (1) This rule requires that a permit application be submitted prior to installation, modification, or use of a source. Weyerhaeuser provided the required permit application. (7) This rule requires that the applicant notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. Weyerhaeuser submitted an affidavit of publication of public notice as proof of publication. Public notice was made in the *Daily Inter Lake* on October 31, 2025.

6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by DEQ must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.

7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized.

8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by DEQ at the location of the source.

9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving Weyerhaeuser of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq*.

10. ARM 17.8.759 Review of Permit Applications. This rule describes DEQ's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an environmental impact statement.

11. ARM 17.8.760 Additional Review of Permit Applications. This rule describes DEQ's responsibilities for processing permit applications and making permit

decisions on those applications that require an environmental impact statement.

12. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or modified source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.

13. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of the permittee, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).

14. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.

15. ARM 17.8.765 Transfer of Permit. This section states that an air quality permit may be transferred from one person to another if written notice of Intent to Transfer, including the names of the transferor and the transferee, is sent to DEQ.

F. ARM 17.8, Subchapter 8 – Prevention of Significant Deterioration of Air Quality, including, but not limited to:

1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.

2. ARM 17.8.818 Review of Major Stationary Sources and Major Modifications--Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification, with respect to each pollutant subject to regulation under the Federal Clean Air Act (FCAA) that it would emit, except as this subchapter would otherwise allow.

This facility is not a listed source but has potential emissions greater than 250 tons per year; therefore, the facility is major. The current permit action does not result in a significant emissions increase; therefore, it does not require review under the

Prevention of Significant Deterioration program. The emissions analysis can be found in the emissions inventory portion of this document.

G. ARM 17.8, Subchapter 12 – Operating Permit Program Applicability, including, but not limited to:

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any source having:

   a. Potential to Emit (PTE) > 100 tons/year of any pollutant;

   b. PTE > 10 tons/year of any one hazardous air pollutant (HAP), PTE > 25 tons/year of a combination of all HAPs, or lesser quantity as DEQ may establish by rule; or

   c. Sources with the PTE > 70 tons/year of PM_{10} in a serious PM_{10} nonattainment area.

2. ARM 17.8.1204 Air Quality Operating Permit Program. (1) Title V of the FCAA amendments of 1990 requires that all sources, as defined in ARM 17.8.1204(1), obtain a Title V Operating Permit. In reviewing and issuing MAQP #2602-13 for Weyerhaeuser, the following conclusions were made:

   a. The facility's PTE is greater than 100 tons/year for PM, PM_{10}, CO, and NO_X.

   b. The facility's PTE is less than 10 tons/year for any one HAP and less than 25 tons/year for all HAPs as a result of limitations in place specifically to ensure the source is not considered a major source for HAPs.

   c. This source is not located in a serious PM_{10} nonattainment area.

   d. This facility is not subject to any current NSPS.

   e. This facility is subject to current NESHAP (40 CFR 63 Subpart JJJJJJ – Standards for Industrial, Commercial, and Institutional Boilers at Area Sources.).

   f. This source is not a Title IV affected source, nor a solid waste combustion unit.

   g. This source is not an EPA designated Title V source.

   Based on these facts, DEQ determined that Weyerhaeuser is a major source of criteria pollutant emissions as defined under Title V. Production limits are in place to reduce HAP emissions to below the major source threshold, thus becoming an area source of HAPs.

III. BACT Determination

A BACT determination is required for each new or modified source. Weyerhaeuser shall install on the new or modified source the maximum air pollution control capability, which is technically practicable and economically feasible, except that BACT shall be utilized.

A BACT analysis was submitted by Weyerhaeuser in permit application #2602-14, addressing some available methods of controlling particulate matter emissions from the RDO 616 Screener. DEQ reviewed these methods, as well as previous BACT determinations. The following control options have been reviewed by DEQ in order to make the following BACT determination.

The RDO 616 Screener is used to separate bark, rock and sawdust and includes multiple conveyor transfer points and a screener. Particulate emissions results from the material handling and screening process. Reclaimed wood fiber is taken to the hog fuel pile and used as fuel for the hog fuel boiler (EU001). Soil and wood fines are used for landscaping purposes, while rock and gravel are returned to the log yard. The unit is powered by an onboard 74 hp (55kW) diesel engine and included a 65-gallon diesel storage tank.

$PM/PM_{10}/PM_{2.5}$ BACT Review for the RDO 616 Screener – Material Handling and Screening

Step 1 – Identify all control Technologies

Potentially applicable particulate control technologies include:

• Wind barriers

• Use of water spray

Step 2 – Eliminate Technically Infeasible Options

Water spray could be used to reduce particulate emissions from the RDO 616 Screener material transfer and screening operations; however, as previously stated, reclaimed wood fiber is used as fuel for the hog fuel boiler (EU001). Increasing the moisture content of the wood fiber would require combustion of additional fuel in the boiler to offset the reduced heating value of wet wood versus dry. This would result in increased emissions from the boiler; therefore, use of water spray is not considered further.

Wind barriers are considered technically feasible.

Step 3 – Rank Remaining Control Options by Effectiveness

The only remaining control option identified is wind barriers.

Step 4 – Evaluate Most Effective Control Options

Per the Western Regional Air Partnership's (WRAP) Fugitive Dust Handbook, use of wind barriers has an estimated PM10 control efficiency of 75 percent. Wind barriers have a varying

degree of effectiveness that is dependent on multiple factors such as wind speed and direction. Due to the inherently low particulate emission rates from the material handling operations associated with the RDO 616 Screener (6.23 tpy PM, 2.18 tpy PM_{10}, 1.98 tpy $PM_{2.5}$), installation of wind barriers would not result in a significant reduction in emissions of $PM/PM_{10}/PM_{2.5}$.

Step 5 – Select BACT

Given the magnitude of emissions reductions, installation of wind barriers would not be cost effective. As such, Weyerhaeuser proposes no control as BACT for the RDO 616 Screener.

CO, NO_X, VOC, SO_2, $PM/PM_{10}/PM_{2.5}$ BACT Review for the RDO 616 Screener – Diesel Engine

Steps 1-5

The RDO 616 Screener is powered by an onboard Caterpillar C3.4 74 hp (55 kW) diesel engine that is certified to meet the following EPA Tier 4 emission standards:

- NO_X + NMHC: 4.7 grams per kilowatt hour (g/kW-hr).
- CO: 5.0 g/kW-hr.
- PM: 0.03 g/kW-hr.

The engine is subject to NSPS Subpart IIII which requires the use of ultra-low sulfur diesel fuel that meets the fuel sulfur limit of 15 ppm in 40 CFR 1090.305 per 40 CFR 60.4207(b).

As previously stated, the hours of operation for the RDO 616 Screener will be limited to 1,500 hr/yr. Given the limited operation and low CO, NOX, VOC, PM, PM10, PM2.5, and SO2 emissions from the engine, any add-on control technologies would not be considered cost effective and would not result in a significant reduction in emissions. Therefore, Weyerhaeuser proposes BACT for the RDO 616 Screener diesel engine to be good combustion practices, maintaining the engine's Tier 4 certification, and compliance with applicable requirements under NSPS Subpart IIII.

IV. Emission Inventory

MAQP 2602-14

Emitting Unit	PM	PM_{10}	NO_X	VOC	CO	SO_X
Hog Fuel Boiler	49.30	49.30	452.82	22.12	2216.28	7.54
Veneer Dryers	55.19	55.19	0.00	11.4	0.00	0.00
Lumber Dry Kilns	0.00	0.00	0.00	80.0	0.00	0.00
Log Debarking (sawmill and plywood)	4.25	2.34	0.00	0.00	0.00	0.00
Block Sawing(Sawmill and Plywood)	8.50	4.68	0.00	0.00	0.00	0.00
Sawmill Chip Bin Cyclone	11.30	5.65	0.00	0.00	0.00	0.00
Planer Shavings Bin Baghouse	7.51	7.51	0.00	0.00	0.00	0.00
Dry Chip Baghouse	3.75	3.75	0.00	0.00	0.00	0.00
Fines Cyclone	5.87	2.93	0.00	0.00	0.00	0.00
Sanderdust Silo Baghouse	1.40	1.40	0.00	0.00	0.00	0.00
Sander Cyclone Baghouse	27.02	27.02	0.00	0.00	0.00	0.00
Sawline Baghouse	3.90	3.90	0.00	0.00	0.00	0.00
Dry Fuel Baghouse	3.77	3.77	0.00	0.00	0.00	0.00
Hog Fuel Pile & Fuel Bunker	24.18	9.07	0.00	0.00	0.00	0.00
Plywood Chips Truck Loadout	9.54	3.39	0.00	0.00	0.00	0.00
Sawmill/Planer Chips	10.67	3.79	0.00	0.00	0.00	0.00
Fines Truck Loadout	24.19	8.71	0.00	0.00	0.00	0.00
Planer Shavings Truck Loadout	30.00	18.00	0.00	0.00	0.00	0.00
Fugitive Road Dust	68.10	24.51	0.00	0.00	0.00	0.00
Log Yard Emissions	8.16	0.35	0.00	0.00	0.00	0.00
RDO 616 Screener	6.24	2.18	0.43	0.00	0.46	0.00
Veneer Lathe	0.00	0.00	0.00	11.90	0.00	0.00
Total	**362.84**	**237.44**	**453.25**	**125.42**	**2,215.74**	**7.54**

*Calculations supporting emission estimates for sources not affected by the MAQP #2602-11 permitting action are contained in the analysis for MAQP #2602-05, #2602-06, #2602-07, #2602-09

Plywood and Sawmill Production Data:

Achievable Production Data [1]		
Biofilter Control of HAP:	45%	reduction of HAP
Biofilter Control of Formaldehyde	75%	reduction of HCOH
Emergency Generator:	460	kW
Boiler Max Rating:	120,000	lb/hr steam
Max Production Plywood:	140,000	MSF 3/8"
Max Production Sawmill Kilns:	130,000	MBF
Operation Hours: [2]	8,760	hrs/yr

1. The achievable production rates is the maximum possible production rate at which the facility can be considered a synthetic minor for HAPs. The emergency generator's emissions are calculated on a 500 hours per year basis. The rest of the production data is linearly scalable from the maximum production data using the same scaling factor for each production input parameter.
2. The hours of operation are used to calculate the emissions from the Veneer Dryers' Emissions Test which detail the HAP emission rate for formaldehyde, methanol, acetaldehyde, acrolein, propionaldehyde, and phenol in units of lb/hr.

HAP Summary: [1]

Compound	Total Emissions (tpy)	Below Major Threshold?
Acetaldehyde	7.40	Yes
Acrolein	0.44	Yes
Benzene	0.66	Yes
Formaldehyde	2.28	Yes
Hydrochloric Acid	0.00	Yes
Methanol	9.69	Yes
Methyl Isobutyl Ketone	0.84	Yes
Phenol	1.06	Yes
Misc. HAPs	2.24	Yes
Total HAPs	24.60	Yes

1. The major source thresholds are 10 tpy for individual HAPs and 25 tpy for combined HAPs.

HAP Emissions Inventory:

Compound	HAP?	Sawmill Kilns (lb/yr)	Ply Vats (lb/yr)	Veneer Dryers (Biofilter) [2,3] (lb/yr)	Ply Press (lb/yr)	Veneer Dryer Cooling Zone (lb/yr)	Boiler [4] (lb/yr)	Emergency Generator [5] (lb/yr)	Veneer Lathe (lb/yr)	Total (tons/yr)
1,1-Dichloroethane	#N/A	--	--	--	--	--	--	--	--	0.00
1,1,1-Trichloroethane	Yes	--	--	--	--	--	73.0	--	--	0.04
1,1,2-Trichloroethane	Yes	--	--	--	--	--	--	--	--	0.00
1,2,3,4,6,7,8,9-octachlorodibenzofuran	Yes	--	--	--	--	--	0.0	--	--	0.00
1,2,3,4,6,7,8,9-octachlorodibenzo-p-dioxin	Yes	--	--	--	--	--	0.0	--	--	0.00
1,2,3,4,6,7,8-heptachlorodibenzofuran	Yes	--	--	--	--	--	0.0	--	--	0.00
1,2,3,4,6,7,8-heptachlorodibenzo-p-dioxin	Yes	--	--	--	--	--	0.0	--	--	0.00
1,2,3,4,7,8,9-heptachlorodibenzofuran	Yes	--	--	--	--	--	0.0	--	--	0.00
1,2,3,4,7,8-hexachlorodibenzofuran	Yes	--	--	--	--	--	0.0	--	--	0.00
1,2,3,4,7,8-hexachlorodibenzo-p-dioxin	Yes	--	--	--	--	--	0.0	--	--	0.00
1,2,3,6,7,8-hexachlorodibenzofuran	Yes	--	--	--	--	--	0.0	--	--	0.00
1,2,3,6,7,8-hexachlorodibenzo-p-dioxin	Yes	--	--	--	--	--	0.0	--	--	0.00

Compound	HAP?	Sawmill Kilns (lb/yr)	Ply Vats (lb/yr)	Veneer Dryers (Biofilter) [2,3] (lb/yr)	Ply Press (lb/yr)	Veneer Dryer Cooling Zone (lb/yr)	Boiler [4] (lb/yr)	Emergency Generator [5] (lb/yr)	Veneer Lathe (lb/yr)	Total (tons/ yr)
1,2,3,7,8,9-hexachlorodibenzofuran	Yes	--	--	--	--	--	0.0	--	--	0.00
1,2,3,7,8,9-hexachlorodibenzo-p-dioxin	Yes	--	--	--	--	--	0.0	--	--	0.00
1,2,3,7,8-pentachlorodibenzofuran	Yes	--	--	--	--	--	0.0	--	--	0.00
1,2,3,7,8-pentachlorodibenzo-p-dioxin	Yes	--	--	--	--	--	0.0	--	--	0.00
1,2,4-Trichlorobenzene	Yes	--	--	--	--	--	--	--	--	0.00
1,1-Dichloroethene	Yes	--	--	--	--	--	--	--	--	0.00
1,2-Dichloroethane	Yes	--	--	--	--	--	36.9	--	--	0.02
1,2-Dichloropropane	Yes	--	--	--	--	--	21.2	--	--	0.01
1,3-Butadiene	Yes	--	--	--	--	--	--	0.0	--	0.00
1,4-Dichlorobenzene	Yes	--	--	--	--	--	352.5	--	--	0.18
2,3,4,6,7,8-hexachlorodibenzofuran	Yes	--	--	--	--	--	0.0	--	--	0.00
2,3,4,7,8-pentachlorodibenzofuran	Yes	--	--	--	--	--	0.0	--	--	0.00
2,3,7,8-tetrachlorodibenzofuran	Yes	--	--	--	--	--	0.0	--	--	0.00
2,3,7,8-tetrachlorodibenzo-p-dioxin	Yes	--	--	--	--	--	0.0	--	--	0.00
2,4,6-Trichlorophenol	Yes	--	--	--	--	--	0.3	--	--	0.00
2,4-Dinitrophenol	Yes	--	--	--	--	--	0.2	--	--	0.00
2,4-Dinitrotoluene	Yes	--	--	--	--	--	1.2	--	--	0.00
2-Chloronaphthalene	Yes	--	--	--	--	--	0.0	--	--	0.00
2-Methyl Naphthalene	Yes	--	--	--	--	--	1.8	--	--	0.00
4,6-Dinitro-2-methylphenol	Yes	--	--	--	--	--	2.7	--	--	0.00
4-Nitrophenol	Yes	--	--	--	--	--	0.1	--	--	0.00
Acenaphthene	Yes	--	--	--	--	--	1.1	--	--	0.00
Acenaphthylene	Yes	--	--	--	--	--	5.9	--	--	0.00
Acetaldehyde	Yes	8,866	654	3,180	529	518	357.6	0.6	708.4	7.40
Acetophenone	Yes	--	--	--	--	--	2.3	--	--	0.00
Acrolein	Yes	143	--	385	--	--	328.5	0.1	16.9	0.44
Anthracene	Yes	--	--	--	--	--	3.4	--	--	0.00
Antimony	Yes	--	--	--	--	--	--	--	--	0.00
Arsenic	Yes	--	--	--	--	--	2.4	--	--	0.00
Benzene	Yes	--	--	72	--	--	1,238.3	0.7	--	0.66

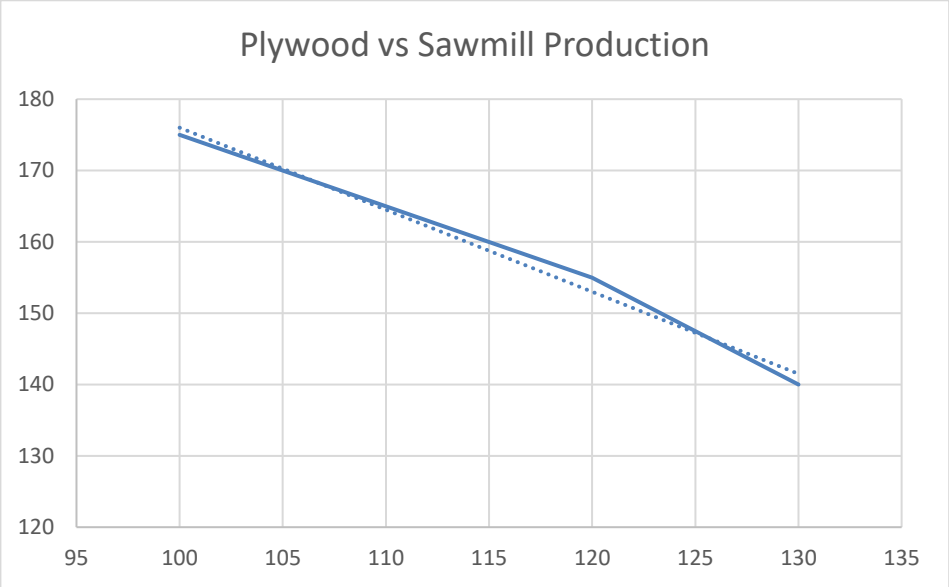
Compound	HAP?	Sawmill Kilns (lb/yr)	Ply Vats (lb/yr)	Veneer Dryers (Biofilter) [2,3] (lb/yr)	Ply Press (lb/yr)	Veneer Dryer Cooling Zone (lb/yr)	Boiler [4] (lb/yr)	Emergency Generator [5] (lb/yr)	Veneer Lathe (lb/yr)	Total (tons/ yr)
Benzo(a)anthracene	Yes	--	--	--	--	--	0.1	--	--	0.00
Benzo(a)phenanthrene	Yes	--	--	--	--	--	0.1	--	--	0.00
Benzo(a)pyrene	Yes	--	--	--	--	--	3.4	--	--	0.00
Benzo(b)fluoranthene	Yes	--	--	--	--	--	0.2	--	--	0.00
Benzo(e)pyrene	Yes	--	--	--	--	--	0.3	--	--	0.00
Benzo(g,h,i)perylene	Yes	--	--	--	--	--	0.2	--	--	0.00
Benzo(j)fluoranthene	Yes	--	--	--	--	--	0.2	--	--	0.00
Benzo(j,k)fluoranthene	Yes	--	--	--	--	--	0.2	--	--	0.00
Benzo(k)fluoranthene	Yes	--	--	--	--	--	0.1	--	--	0.00
Beryllium	Yes	--	--	--	--	--	0.0	--	--	0.00
Bis(2-Ethylhexyl)phthalate	Yes	--	--	--	--	--	0.1	--	--	0.00
Bromomethane	Yes	--	--	--	--	--	14.4	--	--	0.01
Cadmium	Yes	--	--	--	--	--	0.5	--	--	0.00
Camphene	Yes	--	--	--	--	--	--	--	--	0.00
Carbazole	Yes	--	--	--	--	--	2.3	--	--	0.00
Carbon Disulfide	Yes	--	--	--	--	--	157.9	--	--	0.08
Carbon Tetrachloride	Yes	--	--	--	--	--	14.7	--	--	0.01
Chlorine	Yes	--	--	--	--	--	--	--	--	0.00
Chlorobenzene	Yes	--	--	--	--	--	21.0	--	--	0.01
Chloroethane	Yes	--	--	--	--	--	--	--	--	0.00
Chloroform	Yes	--	--	--	--	--	25.4	--	--	0.01
Chloromethane	Yes	--	--	--	--	--	47.8	--	--	0.02
Chromium	Yes	--	--	--	--	--	3.1	--	--	0.00
Chromium (VI)	Yes	--	--	--	--	--	0.3	--	--	0.00
Cobalt	Yes	--	--	--	--	--	3.0	--	--	0.00
Cumene	Yes	--	--	--	--	--	22.4	--	--	0.01
Decachlorobiphenyl	Yes	--	--	--	--	--	0.0	--	--	0.00
Dibenzo(a,h)anthracene	Yes	--	--	--	--	--	0.0	--	--	0.00
Dichlorobiphenyl	Yes	--	--	--	--	--	0.0	--	--	0.00
Di-n-Butyl Phthalate	Yes	--	--	--	--	--	42.1	--	--	0.02
Ethyl Benzene	Yes	--	--	--	--	--	499.1	--	--	0.25
Fluoranthene	Yes	--	--	--	--	--	2.1	--	--	0.00
Fluorene	Yes	--	--	--	--	--	3.8	--	--	0.00
Formaldehyde	Yes	247	--	2,409	529	--	1,288.8	0.9	76.2	2.28
Heptachlorodibenzo-p-furans	Yes	--	--	--	--	--	0.0	--	--	0.00
Hexachlorobenzene	Yes	--	--	--	--	--	1.3	--	--	0.00
Hexachlorobiphenyl	Yes	--	--	--	--	--	0.0	--	--	0.00
Hexachlorodibenzo-p-dioxins	Yes	--	--	--	--	--	2.0	--	--	0.00

Compound	HAP?	Sawmill Kilns (lb/yr)	Ply Vats (lb/yr)	Veneer Dryers (Biofilter) [2,3] (lb/yr)	Ply Press (lb/yr)	Veneer Dryer Cooling Zone (lb/yr)	Boiler [4] (lb/yr)	Emergency Generator [5] (lb/yr)	Veneer Lathe (lb/yr)	Total (tons/ yr)
Hexachlorodibenzo-p-furans	Yes	--	--	--	--	--	0.0	--	--	0.00
Hydrochloric Acid	Yes	--	--	--	--	--	--	--	--	0.00
Hydrogen Cyanide	Yes	--	--	--	--	--	25.9	--	--	0.01
Hydrogen Fluoride	Yes	--	--	--	--	--	--	--	--	0.00
Indeno(1,2,3-c,d)pyrene	Yes	--	--	--	--	--	0.1	--	--	0.00
Lead	Yes	--	--	--	--	--	6.6	--	--	0.00
m,p-Xylene	Yes	--	--	144	--	137	4.5	--	--	0.14
Manganese	Yes	--	--	--	--	--	115.4	--	--	0.06
MDI	Yes	--	--	--	--	--	--	--	--	0.00
Mercury	Yes	--	--	--	--	--	1.3	--	--	0.00
Methanol	Yes	8,970	1,027	1,734	6,017	700	924.9	--	--	9.69
Methyl Isobutyl Ketone	Yes	--	--	102	291	728	562.3	--	--	0.84
Methylene Chloride	Yes	--	--	--	--	--	691.2	--	--	0.35
Monochlorobiphenyl	Yes	--	--	--	--	--	0.0	--	--	0.00
Naphthalene	Yes	--	--	--	--	--	125.8	--	--	0.06
n-Hexane	Yes	--	--	--	--	--	363.9	--	--	0.18
Nickel	Yes	--	--	--	--	--	3.5	--	--	0.00
Octochlorodibenzo-p-dioxins	Yes	--	--	--	--	--	0.1	--	--	0.00
o-Xylene	Yes	26	--	--	--	83	14.3	--	--	0.06
Pentachlorobiphenyl	Yes	--	--	--	--	--	0.0	--	--	0.00
Pentachlorophenol	Yes	--	--	--	--	--	0.3	--	--	0.00
Perylene	Yes	--	--	--	--	--	0.0	--	--	0.00
Phenanthrene	Yes	--	--	--	--	--	8.2	--	--	0.00
Phenol	Yes	1,339	--	145	379	48	202.2	--	--	1.06
Phosphorus	Yes	--	--	--	--	--	24.4	--	--	0.01
Propionaldehyde	Yes	91	--	29	--	--	318.4	--	--	0.22
Pyrene	Yes	--	--	--	--	--	4.5	--	--	0.00
Selenium	Yes	--	--	--	--	--	2.0	--	--	0.00
Styrene	Yes	--	--	--	--	--	602.7	--	--	0.30
Tetrachlorobiphenyl	Yes	--	--	--	--	--	0.0	--	--	0.00
Tetrachlorodibenzo-p-dioxins	Yes	--	--	--	--	--	0.0	--	--	0.00
Tetrachlorodibenzo-p-furans	Yes	--	--	--	--	--	0.0	--	--	0.00
Tetrachloroethylene	Yes	--	--	--	--	--	31.1	--	--	0.02
Toluene	Yes	13	--	152	--	--	26.7	0.3	--	0.10
Trichlorobiphenyl	Yes	--	--	--	--	--	0.0	--	--	0.00
Trichloroethylene	Yes	--	--	--	--	--	25.1	--	--	0.01
Vinyl Chloride	Yes	--	--	--	--	--	23.2	--	--	0.01
Xylenes (mixed isomers)	Yes	--	--	--	--	--	6.6	0.2	--	0.00

Compound	HAP?	Sawmill Kilns (lb/yr)	Ply Vats (lb/yr)	Veneer Dryers (Biofilter) [2,3] (lb/yr)	Ply Press (lb/yr)	Veneer Dryer Cooling Zone (lb/yr)	Boiler [4] (lb/yr)	Emergency Generator [5] (lb/yr)	Veneer Lathe (lb/yr)	Total (tons/yr)
Total HAPs (tons/yr)		9.85	0.84	4.18	3.87	1.11	4.35	0.00	0.40	24.60

Sliding Production Scale Calculations

Sawmill Production mm	100	110	120	130	
Plywood Production mm	175	165	155	140	
Max single HAP	9.62	9.69	9.76	9.69	max 10 tons
Max multi HAP	23.94	24.24	24.53	24.60	max 25 tons



Any production below line is acceptable for Minor Source

single HAP	sawmill	100	110	120	130
	plywood	175	165	155	140
	eq. single	9.62	9.69	9.76	9.67
multi HAP	sawmill	100	110	120	130
	plywood	175	165	155	140
	eq. multi	23.94	24.24	24.53	24.60

eq. single **=(saw*0.039437) + (ply*0.032436) <10**

eq. multi **=(saw*0.108923) + (ply*0.074552) <25**

Assumptions:

The maximum production rates except for that of the emergency generator and maximum plywood production are all linearly scalable. Each maximum production data is based on a single production scaling factor, when appropriate This assumes that the facility is not limited by any one particular production rate (i.e. a 50% boiler steam rate can only support a 40% sawmill kilns production rate).

The emergency generator is assumed to be in operation 500 hours per year regardless of the other production rates at the facility.

The Veneer Dryer's Biofilter has an 75% control of Formaldehyde and 45% for all other organic HAPs.

The Veneer Dryer is indirectly fired.

The Veneer Dryer emissions test for HAPs is based on the Veneer Dryers operating continuously at full capacity. This assumption is crucial as the emission rates are given on a ppm or lb/hr basis.

Douglas Fir and Larch wood species are primarily used at the Weyerhaeuser facility. All emission factors are based on Western Softwoods when the emission factors do not detail the specific wood species used.

Hydrogen chloride (hydrochloric acid), hydrogen fluoride, chlorine, and antimony are non-detectable per Weyerhaeuser analytical report of the boilers.

HAP Potential to Emit Equations

Sawmill Kilns

Speciated Emission Rate ($^{lb}/_{yr}$) = Max Production Sawmill Kilns ($^{MBF}/_{yr}$) * Kiln Emission Factor ($^{lb}/_{MBF}$)

Kiln Emission Factor ($^{lb}/_{MBF}$) =		
	if $K_{EPA} > 0$	$= K_{EPA}$
	if $K_{EPA} = 0$ or "--"	$= K_{NCASI}$

where: K_{EPA} = EPA Region 10 Lumber Drying Kilns emission factor ($^{lb}/_{MBF}$)

K_{NCASI} = NCASI Sawmill Kiln emission factor ($^{lb}/_{MBF}$)

Ply Vats

Speciated Emission Rate ($^{lb}/_{yr}$) = Max Production Plywood ($^{MSF}/_{yr}$) * NCASI Ply Vats Emission Factor ($^{lb}/_{MSF}$)

Veneer Dryer with Biofilter

Speciated Emission Rate ($^{lb}/_{yr}$) =		
	if $V_{ST} > 0$	$= V_{ST}$ * Hours of Operation ($^{hrs}/_{yr}$) * (1 - BF)
	if $V_{ST} = 0$ or "--"	$= V_{NCASI}$ * Max Production Plywood ($^{lb}/_{MSF}$) * (1 - BF)

where: V_{ST} = Veneer Dryer Stack Test ($^{lb}/_{hr}$)

V_{NCASI} = NCASI Veneer Dryer emission factor ($^{lb}/_{MSF}$)

BF = Biofilter Control of HAP.

Ply Press

Speciated Emission Rate ($^{lb}/_{yr}$) = Max Production Plywood ($^{MSF}/_{yr}$) * NCASI Ply Press Emission Factor ($^{lb}/_{MSF}$)

Veneer Dryer Cooling Zone

Speciated Emission Rate ($^{lb}/_{yr}$) = Max Production Plywood ($^{MSF}/_{yr}$) * Cooling Zone Emission Factor ($^{lb}/_{MSF}$)

Cooling Zone Emission Factor ($^{lb}/_{MSF}$) =

if CZ_{NCASI} = ND	= 0
if CZ_{NCASI} > 0	= CZ_{NCASI}
if CZ_{NCASI} = 0 or "--"	= CZ_{NESHAP}
if CZ_{NCASI} and CZ_{NESHAP} = 0 or "--"	= CZ_{AP42}

where:

CZ_{NCASI} = NCASI Cooling Zone Emission Factor ($^{lb}/_{MSF}$)

CZ_{NESHAP} = NESHAP Cooling Zone Emission Factor ($^{lb}/_{MSF}$)

CZ_{AP42} = AP-42 Cooling Zone Emission Factor ($^{lb}/_{MSF}$)

ND = Non-Detect

Boiler

Speciated Emission Rate ($^{lb}/_{yr}$) = Max Boiler Rating ($^{lb\ steam}/_{hr}$) * 1,202 ($^{Btu}/_{lb\ steam}$) / 10^6 ($^{Btu}/_{MMBtu}$) * 8,760 ($^{hr}/_{yr}$) * Boiler Emission Factor ($^{lb}/_{MMBtu}$)

Boiler Emission Factor ($^{lb}/_{MMBtu}$) =

if B_{NCASI} = ND	=0
if B_{NCASI} > 0	= B_{NCASI}
if B_{NCASI} = 0 or "--"	= B_{AP42}

where:

B_{NCASI} = NCASI Boiler Emission Factor ($^{lb}/_{MMBtu}$)

B_{AP42} = AP-42 Boiler Emission Factor ($^{lb}/_{MMBtu}$)

Emergency Generator

Speciated Emission Rate ($^{lb}/_{yr}$) = Emergency Generator Capacity (kW) * 3412.142 ($^{Btu}/_{kW}$) / 10^6 ($^{Btu}/_{MMBtu}$) * 500 ($^{hr}/_{yr}$) * Generator Emission Factor ($^{lb}/_{MMBtu}$)

Lumber Dry Kilns
Production Rate: 100,000 MBF/yr * 1.6 lb/MBF / 2000 lbs = 80 tpy VOC

Veneer Dryers
Production Rate: 175,000 MSF/yr / 10 * 1.3 lb/10^4SF / 2000 lbs = 11.4 tpy VOC

Dry Chip Baghouse
25,000 dscfm * 60 min/hr * 0.004 gr/dscf * 1 lb/7000 gr * 8760 hr/yr * ton/2000 lb = 3.75 ton/yr

Planer Baghouse
50,000 dscfm * 60 min/hr * 0.0004 gr/dscf * 1 lb/7000 gr * 8760 hr/yr * ton/2000 lb = 7.51 ton/yr

**Calculations of VOC and HAP emissions were submitted as part of the MAQP #2602-11 application and is within the electronic files associated with this application.

RDO 616 Screener emission calculations *

In determining the RDO screener emissions for MAQP #2602-14, the following calculations were used:

BARK
Total throughput: 45%
Material Density: 0.346 g/cm3
Emission Factor: PM= 0.02, PM10= 0.011 (3-07-008-01: Log Debarking) **

Calculations:
PM= 0.02 x 0.346 g/cm3 x 0.8428 x 100 yd3/hr x 0.45 x 1,500 hpy x 0.0005 lb/ton = 0.1968 tpy
PM10= 0.011 x 0.346 g/cm3 x 0.8428 x 100 yd3/hr x 0.45 x 1,500 hpy x 0.0005 lb/ton = 0.1083 tpy

ROCK
Total throughput: 15%
Material Density: 2.65 g/cm3
Emission Factor: PM= 0.029, PM10 = 0.0064 (3-05-025-03: Material Transfer) **

Calculations:
PM= 0.029 x 2.65 g/cm3 x 0.8428 x 100 yd3/hr x 0.15 x 1,500 hpy x 0.0005 lb/ton = 0.7287 tpy
PM10= 0.0064 x 2.65 g/cm3 x 0.8428 x 100 yd3/hr x 0.15 x 1,500 hpy x 0.0005 lb/ton = 0.1608 tpy

SAWDUST
Total throughput: 40%
Material Density: 0.21 g/cm3
Emission Factor: PM =1.0, PM10 = 0.36 (3-07-008-03: Sawdust Pile Handling) **

Calculations:
PM= 1.0 x 0.21 g/cm3 x 0.8428 x 100 yd3/hr x 0.40 x 1,500 hpy x 0.0005 lb/ton = 5.310 tpy
PM10= 0.36 x 0.21 g/cm3 x 0.8428 x 100 yd3/hr x 0.40 x 1,500 hpy x 0.0005 lb/ton = 1.911 tpy

TOTAL
Calculations:
PM = 0.1968 tpy + 0.7287 tpy + 5.310 tpy = 6.2355 tpy
PM10 = 0.1083 tpy + 0.1608 tpy + 1.911 tpy = 2.1801 tpy

* Emissions summarized below do not include minor emissions from the engine and storage tank associated with the RDO 616 Screener.
** EIIP V02 Ch14 Uncontrolled Emission Factors for Criteria Air Pollutants

V. Existing Air Quality

The Kalispell facility is located in the E ½, SE ¼ of Section 32 & W ½ , SW ¼ of Section 33, T29N, R21W, in Flathead County, Montana. The facility is located in a PM_{10} nonattainment area; however, the 2017 PM_{10} PTE for the facility was determined to be 235 tpy, which is less than when the September 17, 1993, PM_{10} NAA control plan for the area was developed.

VI. Air Quality Impacts

DEQ determined that there will be no impacts from this permitting action because this permitting action is considered an administrative action. Therefore, DEQ believes this action will not cause or contribute to a violation of any ambient air quality standard.

VII. Ambient Air Impact Analysis

Based on the information provided and the conditions established in MAQP #2602-14, DEQ determined that the impact from this permitting action will be minor.

VIII. Taking or Damaging Implication Analysis

As required by § 2-10-105, MCA, DEQ conducted the following private property taking and damaging assessment.

YES	NO	
X		1. Does the action pertain to land or water management or environmental regulation affecting private real property or water rights?
	X	2. Does the action result in either a permanent or indefinite physical occupation of private property?
	X	3. Does the action deny a fundamental attribute of ownership? (ex.: right to exclude others, disposal of property)
	X	4. Does the action deprive the owner of all economically viable uses of the property?
	X	5. Does the action require a property owner to dedicate a portion of property or to grant an easement? [If no, go to (6)].
X		5a. Is there a reasonable, specific connection between the government requirement and legitimate state interests?
X		5b. Is the government requirement roughly proportional to the impact of the proposed use of the property?
	X	6. Does the action have a severe impact on the value of the property? (consider economic impact, investment-backed expectations, character of government action)
	X	7. Does the action damage the property by causing some physical disturbance with respect to the property in excess of that sustained by the public generally?
	X	7a. Is the impact of government action direct, peculiar, and significant?
	X	7b. Has government action resulted in the property becoming practically inaccessible, waterlogged or flooded?
	X	7c. Has government action lowered property values by more than 30% and necessitated the physical taking of adjacent property or property across a public way from the property in question?

YES	NO	
	X	Takings or damaging implications? (Taking or damaging implications exist if YES is checked in response to question 1 and also to any one or more of the following questions: 2, 3, 4, 6, 7a, 7b, 7c; or if NO is checked in response to questions 5a or 5b; the shaded areas)

The proposed project would take place on private land. DEQ has determined that the permit conditions are reasonably necessary to ensure compliance with applicable requirements under the Montana Clean Air Act. Therefore, DEQ's approval of MAQP #2602-14 would not have private property-taking or damaging implications

IX. Environmental Assessment

An environmental assessment (EA), prepared pursuant to the applicable requirements of Title 75, Chapter 1, Parts 1-3, was completed for the proposed project. A copy of the EA is attached.

FINAL ENVIRONMENTAL ASSESSMENT

January 5, 2026

Air Quality Permitting Services Section
Air Quality Bureau
Air, Energy and Mining Division
Montana Department of Environmental Quality

PROJECT/SITE NAME: Kalispell Facility

APPLICANT/COMPANY NAME: Weyerhaeuser NR Company

Montana Air Quality Permit #2602-14

LOCATION: SW ¼ of Section 33, Township 29 North, Range 21 West

COUNTY: Flathead

PROPERTY OWNERSHIP: FEDERAL STATE PRIVATE X

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OVERVIEW OF PROPOSED ACTION

Authorizing Action

Pursuant to the Montana Environmental Policy Act (MEPA), Montana agencies are required to prepare an environmental review for state actions that may have an impact on the Montana environment. The Proposed Action is a state action that may have an impact on the Montana environment; therefore, the Montana Department of Environmental Quality (DEQ) must prepare an environmental review. This EA will examine the proposed action and alternatives to the proposed action and disclose potential and proximate impacts that may result from the proposed and alternative actions. DEQ will determine the need for additional environmental review based on consideration of the criteria set forth in Administrative Rules of Montana (ARM) 17.4.608.

Description of DEQ Regulatory Oversight

DEQ implements the Clean Air Act of Montana, overseeing the development of sources of regulated pollutants and associated facilities. DEQ has authority to analyze proposed emitting units subject to rule established in ARM 17.8.743.

Proposed Action

Weyerhaeuser NR Company (Weyerhaeuser) has applied for a Montana Air Quality Permit (MAQP) under the Clean Air Act of Montana, § 75-2-101, et. *seq*, to increase the RDO 616 screener production from 962 hours (hrs) to 1,500 hrs, update the facility-wide HAP compliance equations, incorporate existing veneer lathe into the emissions inventory, and implement enforceable conditions associated with the biofilter into the MAQP. DEQ may not approve a proposed project contained in an application for an air quality permit unless the project complies with the requirements set forth in the CAA of Montana and the administrative rules adopted thereunder, ARMs 17.8.101 et. seq. The proposed action would be located on privately owned land, in Flathead County, Montana. All information included in this EA is derived from the permit application, discussions with the applicant, analysis of aerial photography, topographic maps, and other research tools.

Table 1. Summary of Proposed Action

General Overview	This permitting action increase the production rate of the RDO 616 Screener from 962 hrs to 1,500 hrs, update the facility-wide HAP compliance equations, incorporate existing veneer lathe into the emissions inventory and implement enforceable conditions associated with the biofilter into the MAQP
Duration & Hours of Operation	***Construction:*** *No new construction* ***Operation:*** Continuous operation depending upon operations schedule
Estimated Disturbance	No new ground disturbance associated with the project.
Construction Equipment	No new construction
Personnel Onsite	***Construction:*** No new construction ***Operation:*** No new staff associated with this permitting action.

Location and Analysis Area	***Location****:* 48.231290586394735, -114.28543780993593 ***Analysis Area****:* The area being analyzed as part of this environmental review includes the immediate project area (Figure 1), as well as neighboring lands surrounding the analysis area, as reasonably appropriate for the impacts being considered.

Table 2. The applicant is required to comply with all applicable local, county, state, and federal requirements pertaining to the following resource areas.

Air Quality	The applicant proposes to increase the production rate of the RDO 616 Screener from 962 hrs to 1,500 hrs, update the facility-wide HAP compliance equations, incorporate existing veneer lathe into the emissions inventory and implement enforceable conditions associated with the biofilter into the MAQP. The increase in production is subject to a regulatory review, including a Best Available Control Technology (BACT) analysis and determination.
Water Quality	This permitting action would not affect water quality. Weyerhaeuser is required to comply with the applicable local, county, state and federal requirements pertaining to water quality.
Erosion Control and Sediment Transport	This permitting action would not affect erosion control and sediment transport once construction on has been completed. Weyerhaeuser is required to comply with the applicable local, county, state and federal requirements pertaining to erosion control and sediment transport during and after construction.
Solid Waste	This permitting action would not affect solid waste. Weyerhaeuser is required to comply with the applicable local, county, state and federal requirements pertaining to solid waste.
Cultural Resources	This permitting action would not affect cultural resources. Weyerhaeuser is required to comply with the applicable local, county, state and federal requirements pertaining to cultural resources.
Hazardous Substances	This permitting action would not contribute to the need to manage any hazardous substances. Weyerhaeuser is required to comply with the applicable local, county, state and federal requirements pertaining to hazardous substances.
Reclamation	This permitting action would not require any reclamation.

Table 3. Cumulative Impacts

Past Actions	In 2023, DEQ received a request from Weyerhaeuser to replace the previously permitted Clark Log Yard Reclaim System with an RDO 616 Screener. The Screener was limited to 962 hrs and was incorporated into the MAQP #2602-13 as an Administrative Amendment.
Present Actions	The applicant proposes to increase the production rate of the RDO 616 Screener from 962 hrs to 1,500 hrs, update the facility-wide HAP compliance equations, incorporate existing veneer lathe into the emissions inventory and implement enforceable conditions associated with the biofilter into the MAQP. The increase in production is subject to a regulatory review, including a Best Available Control Technology (BACT) analysis and determination.
Related Future Actions	DEQ is not aware of any future related projects for this facility. Any future projects would be subject to a new permit application.

Purpose, Need, and Benefits

DEQ's purpose in conducting this environmental review is to act upon Weyerhaeuser's application for a MAQP to increase production of the RDO 616 Screener. DEQ's action on the permit application is governed by § 75-2-201, et seq., Montana Code Annotated (MCA) and the Administrative Rules of Montana (ARM) 17.8.740, et seq.

The applicant's purpose and need, as expressed to DEQ in seeking this action, is to increase production of the RDO 616 Screener, update the facility-wide HAP compliance equations, incorporate existing veneer lathe into the emissions inventory and implement enforceable conditions associated with the biofilter into the MAQP to properly reflect current condition of the permit.

Figure 1. General Location of the Proposed Project

Other Governmental Agencies and Programs with Jurisdiction

The proposed action would be located on private. All applicable local, state, and federal rules must be adhered to, which may also include other local, state, federal, or tribal agency jurisdiction. Other governmental agencies which may have overlapped, or additional jurisdiction include but may not be limited to: Flathead County Health.

EVALUATION OF AFFECTED ENVIRONMENT AND IMPACT BY RESOURCE

The impact analysis will identify and evaluate the proximate direct and secondary impacts TO THE PHYSICAL ENVIRONMENT AND POPULATION IN THE AREA TO BE AFFECTED BY THE PROPOSED PROJECT. *Direct impacts* occur at the same time and place as the action that causes the impact. *Secondary impacts* are a further impact to Montana's environment that may be stimulated, induced by, or otherwise result from a direct impact of the action (ARM 17.4.603(18)). Where impacts would occur, the impacts will be described in this analysis. When the analysis discloses environmental impacts, these are proximate impacts pursuant to 75-1-201(1)(b)(iv)(A), MCA.

Cumulative impacts are the collective impacts on Montana's environment within the borders of Montana of the Proposed Action when considered in conjunction with other past and present actions related to the Proposed Action by location and generic type. Related future actions must also be considered when these actions are under concurrent consideration by any state agency through pre-impact statement studies, separate impact statement evaluation, or permit processing procedures (ARM 17.4.603(7)). The project identified in Table 1 was analyzed as part of the cumulative impacts assessment for each resource subject to review, pursuant to MEPA (75-1-101, et. *seq*).

The duration of the proposed action is quantified as follows:

- **Construction Impacts (short-term):** These are impacts to the environment that would occur during the construction period, including the specific range of time.

- **Operation Impacts (long-term)**: These are impacts to the environment during the operational period of the proposed action, including the anticipated range of operational time.

The intensity of the impacts is measured using the following:

- **No impact**: There would be no change from current conditions.

- **Negligible**: An adverse or beneficial effect would occur but would be at the lowest levels of detection.

- **Minor**: The effect would be noticeable but would be relatively small and would not affect the function or integrity of the resource.

- **Moderate**: The effect would be easily identifiable and would change the function or integrity of the resource.

- **Major**: The effect would alter the resource.

1. Geology and Soil Quality, Stability and Moisture

This section includes the following resource areas, as required in ARM 17.4.609: Geology; Soil Quality, Stability, and Moisture

Affected Environment

Flathead County geology features glacial deposits (till, outwash) and alluvium, creating diverse soils from gravelly loams to silty clay loams, generally stable but variable in drainage (some excessively drained, others poorly drained), with deep aquifers important for water supply, but some areas need monitoring for compaction, erosion, and groundwater levels due to soil types and usage.

The proposed action takes place in an existing industrial site.

Direct Impacts

No direct impacts from construction would be expected because of the proposed project because no construction activities would be necessary to accommodate the proposed action. All impacts would occur within an existing industrial site. Therefore, any operational impacts to geology soil quality, stability, or moisture as a result of the proposed action would be short- and long-term, minor, and consistent with existing impacts.

Secondary Impacts

All impacts would occur within an existing industrial site. Therefore, any operational secondary impacts to geology soil quality, stability, or moisture as a result of the proposed action would be long-term, minor, and consistent with existing impacts.

Cumulative Impacts

All impacts would occur within an existing industrial site. Therefore, any operational cumulative impacts to geology, soil quality, stability, or moisture as a result of the proposed action would be long term, minor and consistent with existing impacts.

2. Water Quality, Quantity, And Distribution

This section includes the following resource areas, as required in ARM 17.4.609: Water Quality, Quantity and Distribution

Affected Environment

Flathead County has water sources from both surface water, such as the Flathead River, and deep groundwater aquifers. Water quality is generally high due to these pristine sources, but challenges exist from development, agriculture, and pollution, including nutrients, silt, and PCBs, which have contributed to gradual declines, particularly in Flathead Lake. Quantity is managed through infrastructure like the Hungry Horse Dam, but drought conditions can reduce river flows and stress supply. Distribution systems include municipal networks, private wells, and reliance on the natural watershed, serving domestic, agricultural, and recreational needs. Monitoring and research are conducted by entities such as the University of Montana Biological Station to track changes and guide management.

Direct Impacts

No direct impacts from construction would be expected because of the proposed project because no construction activities would be necessary to accommodate the proposed action. The proposed action is located in an existing industrial site that has procedures and permits

to protect water quality, quantity, and distribution.

Secondary Impacts

Any secondary impacts to water quality, quantity, and distribution associated with the proposed action would be long-term, minor, and consistent with existing impacts at the mill. The proposed action is located in an existing industrial site that has procedures and permits to protect water quality, quantity, and distribution.

Cumulative Impacts

Any cumulative impacts to water quality, quantity, and distribution associated with the proposed action would be long-term, minor, and consistent with existing impacts at the mill. The proposed action is located in an existing industrial facility that has procedures and permits to protect water quality, quantity, and distribution.

3. Air Quality

This section includes the following resource areas, as required in ARM 17.4.609: Air Quality

Affected Environment

The proposed project is located in SW ¼ of Section 33, Township 29 North, Range 21 West, in Flathead County, Montana. The Kalispell facility is located in the E ½, SE ¼ of Section 32 & W ½, SW ¼ of Section 33, T29N, R21W, in Flathead County, Montana. The facility is located in a PM10 nonattainment area; however, the 2017 PM10 PTE for the facility was determined to be 235 tpy, which is less than when the September 17, 1993 PM10 NAA control plan for the area was developed.

Applicants are required to comply with all laws relating to air, such as the Federal Clean Air Act, NAAQS set by the Environmental Protection Agency (EPA), and the Clean Air Act of Montana.

In addition, MAQP #2602-14 provides legally enforceable conditions regarding the emitting units themselves, pollution controls, and requires the applicate to take reasonable precautions to limit fugitive dust from this location.

Direct Impacts

No direct construction impacts are expected because there is no new construction associated with the proposed action. Direct operational impacts are expected to be minor and long term based on the allowable increase in the facilities' potential to emit. See permit analysis for more information regarding air quality impacts. The majority of emission from the proposed project would be related to the fugitive particulate matter emission associated with the increase in the screener production hours.

Secondary Impacts

Secondary construction and operational impacts from the proposed project are expected to be negligible and short-term. Emissions would not be expected to cause or contribute to a violation of health and welfare-based primary and secondary NAAQS. Secondary NAAQS provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. See permit analysis for more detailed information regarding air quality impacts. Any adverse impacts would be long term and minor. No beneficial secondary impacts would be expected because of the proposed project.

Cumulative Impacts

Conditions and limits contained in the MAQP would limit emissions; therefore, any expected cumulative air quality impacts from the expansion project would be minor and short-term. Flathead County and the surrounding area has other minor stationary sources that contribute to the overall air quality in Flathead County, Montana. The cumulative impacts of these other emitters and the proposed action would not have an adverse impact to air quality.

4. Vegetation Cover, Quantity, and Quality

This section includes the following resource areas, as required in ARM 17.4.609: Vegetation Cover, Quantity and Quality

Affected Environment

DEQ conducted research using the Montana Natural Heritage Program (MTNHP) website and ran a query titled "Environmental Summary Report" dated December 11, 2025. The MTNHP query identified the following plant Species of Concern (SOC) located within or near the affected facility: Scribner's Panic Grass, Geyer's Onion, Pointed Broom Sedge, Columbia Water-meal, Pale-yellow Jewel-weed, Dwarf Woolly-heads, Flatleaf Bladderwort, Short-flowered Monkeyflower, Crawe's Sedge, Panic Grass, Beaked Spikerush, Linearleaf Moonwort, Arctic Sweet Coltsfoot, Long-sheath Waterweed, Water Bulrush, Fleshy Stitchwort, Water Star-grass, Giant Helleborine, Floriferous Monkeyflower, Western Moonwort, Spiny-spore Quillwort, Blunt-leaved Pondweed, and Spalding's Catchfly.

According to MTNHP, *Species of Concern* are native taxa that are at-risk due to declining population trends, threats to their habitats, restricted distribution, and/or other factors. Designation as a Montana Species of Concern or Potential Species of Concern is based on the Montana Status Rank and is not a statutory or regulatory classification. Rather, these designations provide information that helps resource managers make proactive decisions regarding species conservation and data collection priorities.

The proposed action would be located within an already established industrial site. The polygon area analyzed using the MTNHP website produces an area inherently larger than the specific disturbance area, so some additional species may be reported that are not necessarily present in the affected area, but nearby.

Direct Impacts

Direct impacts are informed by information, including information from MTNHP, as cited above, that DEQ had available at the time of draft EA preparation and information provided by the applicant. The permit application provided an analysis of aerial photography, proposed site map, and nearby site details to support EA development. Because the proposed action would occur within the boundary of an existing industrial property, any impacts to vegetation cover, quantity and quality would be minor and long-term.

Secondary Impacts

No additional ground and vegetation disturbance would be expected because of the proposed action. Operation of the permitted equipment, however, would result in the emission of regulated airborne pollutants including NO_X, CO, SO_2, VOCs, PM, and HAPs. As permitted, the proposed project would not be expected to cause or contribute to a violation of the applicable

secondary NAAQS. See permit analysis for more detailed information regarding air quality impacts. Secondary NAAQS provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. Therefore, any secondary impacts would be long-term, consistent with existing impacts in the affected area, and minor.

Cumulative Impacts

No cumulative impacts to vegetative cover, quantity, or quality will occur as a result of the current proposed project because it is an existing industrial site with limited vegetative cover within the property boundary.

5. Terrestrial, Avian, and Aquatic Life and Habitats

This section includes the following resource areas, as required in ARM 17.4.609: Terrestrial and Aquatic Life and Habitats;

Affected Environment

The affected area is represented by pasture, agricultural crops, intermittent oil and gas wells and residential properties. DEQ conducted research using the MTNHP website and ran a query titled "Environmental Summary Report" dated December 11, 2025. The report identified the following animal Species of Concern (SOC) with observations within or near the affected site: Westslope Cutthroat Trout, Bull Trout, Evening Grosbeak, Great Blue Heron, Pileated Woodpecker, Northern Hoary Bat, Monarch, Grizzly Bear, Silver-haired Bat, Long-eared Myotis, Little Brown Myotis, Cassin's Finch, Pacific Wren, Hooked Snowfly, and Alberta Snowfly.

According to MTNHP, *Species of Concern* are native taxa that are at-risk due to declining population trends, threats to their habitats, restricted distribution, and/or other factors. Designation as a Montana Species of Concern or Potential Species of Concern is based on the Montana Status Rank and is not a statutory or regulatory classification. Rather, these designations provide information that helps resource managers make proactive decisions regarding species conservation and data collection priorities. The polygon area analyzed using the MTNHP website produces an area inherently larger than the specific disturbance area, so some of the identified species are not necessarily present within the industrial site, but nearby, especially considering the existing industrial nature of the affected area.

Direct Impacts

Because the affected area constitutes an existing industrial site, any potential impacts to terrestrial, avian and aquatic life and habitats would be long term, negligible to minor, and consistent with existing impacts.

Secondary Impacts

The affected area is an already existing industrial site; Operation of the permitted equipment, however, would result in the emission of regulated airborne pollutants including NO_X, CO, SO_2, VOCs, PM, and HAPs. As permitted, the proposed project would not be expected to cause or contribute to a violation of the applicable secondary NAAQS. See permit analysis for more detailed information regarding air quality impacts. Secondary NAAQS provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. Therefore, any secondary impacts would be long-term, consistent with existing impacts in the affected area, and minor.

Cumulative Impacts

Because the affected area is an existing industrial site, any cumulative impacts to terrestrial, avian and aquatic life would be short- and long-term, negligible, and consistent with existing impacts.

6. Unique, Endangered, Fragile, or Limited Environmental Resources

This section includes the following resource areas, as required in ARM 17.4.609: Unique, Endangered, Fragile, or Limited Environmental Resources.

Affected Environment

As described in Section(s) 4 and 5 above, DEQ conducted a search using the MTNHP webpage. The search used a polygon that overlapped the site and produced the list of species of concern identified in Section 5.

It is not anticipated that this project would cause a shift in any unique quality of the area.

Direct Impacts

No direct construction or operational impacts to unique, endangered, and fragile species or limited environmental resources are expected because of the proposed project. The affected area is an existing industrial site. Therefore, it is unlikely any of the identified species or habitats would be located within the property boundary. If such species are located within or nearby the affected area, any impacts would be short- and long-term, negligible, and consistent with existing impacts.

Secondary Impacts

No secondary impacts from construction or operations are expected as a result of the proposed project. The affected area is an existing industrial site. Therefore, it is unlikely any of the identified species or habitats would be located within the property boundary. If such species are located within or nearby the affected area, any impacts would be short- and long-term, negligible, and consistent with existing impacts.

Cumulative Impacts

No cumulative impacts would be expected to any unique, endangered, fragile, or limited environmental resources. The affected area is an existing industrial site. Therefore, it is unlikely any of the identified species or habitats would be located within the property boundary. If such species are located within or nearby the affected area, any impacts would be short- and long-term, negligible, and consistent with existing impacts.

7. Historical and Archaeological Sites

This section includes the following resource areas, as required in ARM 17.4.609: Historical and Archaeological Sites

Affected Environment

The Montana State Historic Preservation Office (SHPO) was contacted to conduct a file search for historical and archaeological sites within SW ¼ of Section 33, Township 29 North, Range 21 West, Flathead County, Montana. SHPO provided a letter dated December 12, 2025, stating there have been three recorded historical sites within the designated search location.

According to SHPO, any structure over fifty years of age is considered historic and is potentially eligible for listing on the National Register of Historic Places. If any structures are within the Area of Potential Effect, and are over fifty years old, SHPO recommends that they be recorded, and a determination of their eligibility be made prior to any disturbance taking place. It is SHPO's position that the absence of cultural properties in the area does not mean that they do not exist, but rather may reflect the absence of any previous cultural resource inventory in the area, as the records indicated none.

However, should structures need to be altered, or if cultural materials are inadvertently discovered during this proposed action, SHPO requests their office be contacted for further investigation. Because the proposed action would occur within an existing industrial site, it is unlikely any cultural resources exist in the affected area.

Direct Impacts

Three previously recorded historical and no archaeological sites have been identified within the project area. If historical or archaeological resources are unexpectedly discovered during project implementation, Weyerhaeuser must cease implementation, and contact SHPO and any affected Tribal Historic Preservation Offices or THPOs for further evaluation. Therefore, no adverse direct impacts would be expected because of the proposed project.

Secondary Impacts

Three previously recorded historical and no archaeological sites have been identified within the project area. If historical or archaeological resources are unexpectedly discovered during project implementation, Weyerhaeuser must cease implementation, and contact SHPO and any affected THPOs for further evaluation. Therefore, no adverse secondary impacts would be expected because of the proposed project.

Cumulative Impacts

Three previously recorded historical and no archaeological sites have been identified within the project area. If historical or archaeological resources are unexpectedly discovered during project implementation, Weyerhaeuser must cease implementation, and contact SHPO and any affected THPOs for further evaluation. Therefore, no adverse cumulative impacts would be expected because of the proposed project.

8. Aesthetics

This section includes the following resource areas, as required in ARM 17.4.609: Aesthetics

Affected Environment

The area is characterized as an industrial zone on the western edge of Kalispell, Montana, surrounded by timber operations, transportation corridors, and nearby residential and commercial development. The broader area blends industrial activity with the natural beauty of Flathead Valley, where forests, rivers, and mountain views frame the city. The closest structure, including residential homes, is a few hundred feet away. The proposed action would occur on private land.

Direct Impacts

Proposed Action: Explain your assessment of impacts. For each impact described answer who or what would cause the impacts, where specifically the impacts would occur, when in the process of the proposed action the impact would occur, why and how the impact would occur.

Secondary Impacts

Proposed Action: Explain your assessment of impacts. For each impact described answer who or what would cause the impact, where specifically the impact would occur, when in the process of the proposed action the impact would occur, why and how the impact would occur.

Cumulative Impacts

Proposed Action: Explain your assessment of impacts. For each impact described answer how it would cumulatively impact the resource, who or what would cause the impact, where specifically the impact would occur, when in the process of the proposed action the impact occurs, why and how the impact would occur.

9. Demands on Environmental Resources of Land, Water, Air, or Energy

This section includes the following resource areas, as required in ARM 17.4.609: Demands on Environmental Resources of Land, Water, Air, or Energy

Affected Environment

The site is located on private land. See Sections 2, 3, and 4 of this EA for details regarding land, water, and air impacts.

Direct Impacts

There would be a minor increase in demand for the environmental resources of land, air, and energy for these actions. As discussed previously, any direct impacts to air quality from construction and operation of the proposed project would be minor and would not be expected to cause or contribute to a violation of the primary or secondary NAAQS.

Because the proposed action would occur within an existing industrial site, any impacts would be short-term, consistent with existing impacts, and minor. No water would be required for the proposed action. Therefore, any direct impacts would be short-term and minor.

Secondary Impacts

Proposed Action: Explain your assessment of impacts. For each impact described answer who or what would cause the impact, where specifically the impact would occur, when in the process of the proposed action the impact would occur, why and how the impact would occur.

Cumulative Impacts

Proposed Action: Explain your assessment of impacts. For each impact described answer how it would cumulatively impact the resource, who or what would cause the impact, where specifically the impact would occur, when in the process of the proposed action the impact occurs, why and how the impact would occur.

10.Impacts on Other Environmental Resources

This section includes the following resource areas, as required in ARM 17.4.609: Impacts on Other Environmental Resources

Affected Environment

Will this project add or detract from affected views and aesthetics? Will there be any impacts to noise or lighting? Describe any aesthetics that may be altered due to the proposed actions.

Direct Impacts

Proposed Action: Explain your assessment of impacts. For each impact described answer who or what would cause the impacts, where specifically the impacts would occur, when in the process of the proposed action the impact would occur, why and how the impact would occur.

Secondary Impacts

Proposed Action: Explain your assessment of impacts. For each impact described answer who or what would cause the impact, where specifically the impact would occur, when in the process of the proposed action the impact would occur, why and how the impact would occur.

Cumulative Impacts

Proposed Action: Explain your assessment of impacts. For each impact described answer how it would cumulatively impact the resource, who or what would cause the impact, where specifically the impact would occur, when in the process of the proposed action the impact occurs, why and how the impact would occur.

11.Human Health and Safety

This section includes the following resource areas, as required in ARM 17.4.609: Impacts on Human Health and Safety

Affected Environment

The applicant would be required to adhere to all applicable state and federal safety laws. The Occupational Safety and Health Administration (OSHA) has developed rules and guidelines to reduce the risks associated with this type of labor. Few, if any, members of the public would be in immediate proximity to the project during construction or operations.

Direct Impacts

Staff would be expected to use safe working practices subject to oversight by the Occupational Safety and Health Administration or OSHA. Therefore, any direct impacts to human health and safety would be short-term, consistent with existing potential impacts from operations at the industrial site, and negligible to minor.

Secondary Impacts

Any secondary impacts to human health and safety would be long-term, consistent with existing impacts, and negligible. Operation of the permitted equipment would result in the emission of regulated airborne pollutants including NO_X, CO, SO_2, VOCs, PM, and HAPs. As permitted, the proposed project would not be expected to cause or contribute to a violation of the applicable primary or secondary NAAQS. See permit analysis for more detailed information regarding air quality impacts. Primary NAAQS provide public health protection, including protecting the health of "sensitive" populations such as asthmatics, children, and the elderly.

Cumulative Impacts

Any cumulative impacts to human health and safety because of the proposed action would be long-term, consistent with existing impacts, and minor due to the existing industrial nature of the facility and the inherent risks associated with industrial operations.

12.Industrial, Commercial, and Agricultural Activities and Production

This section includes the following resource areas, as required in ARM 17.4.609: Impacts on Industrial, Commercial, and Agricultural Activities and Production

Affected Environment

This site is privately owned land by Weyerhaeuser, and the property is an existing industrial site. The affected area is mainly industrial with residential homes nearby.

Direct Impacts

The proposed action would occur within the footprint of the plywood and sawmill. No direct impacts to commercial or agricultural activities and production are expected because the site is an industrial site with no commercial, agricultural or production activities occurring within the existing mill. Therefore, no direct impacts to industrial production would be expected because of the proposed project.

Secondary Impacts

Industrial activities and production in the affected area would increase because of the proposed action at the existing plywood and sawmill. Therefore, any secondary impacts to industrial activities and production would be long-term, minor, and beneficial. No physical changes are expected with this action; therefore, no adverse secondary impacts would be expected because of the proposed project

Cumulative Impacts

Cumulatively, increased industrial operation provide an important industrial base to the area. These cumulative impacts would be long term and beneficial. No Cumulative impacts on agricultural and commercial activities and production would be expected because of the proposed action, as no physical changes are occurring in the affected area.

13.Quantity and Distribution of Employment

This section includes the following resource areas, as required in ARM 17.4.609: Impacts on Quantity and Distribution of Employment

Affected Environment

The existing industrial facility is staffed appropriately, and this action will not change the need for additional staff.

Direct Impacts

Weyerhaeuser would use existing employees to accommodate the proposed action. Therefore, any direct impacts to the quantity and distribution of employment in the affected area during operation would be long-term, minor and beneficial.

Secondary Impacts

Weyerhaeuser would use existing staff to accommodate the proposed action. Therefore, any

secondary impacts to the quantity and distribution of employment in the affected area would be long-term, negligible and beneficial. No adverse secondary impact would be expected because of the proposed action.

Cumulative Impacts

No cumulative impact are expected on long-term employment as a result of the proposed action because the propose action does not increase the number of full-time employees at Weyerhaeuser.

14.Local and State Tax Base and Tax Revenue

This section includes the following resource areas, as required in ARM 17.4.609: Impacts on Local and State Tax Base and Tax Revenue

Affected Environment

The proposed action would be small by industrial standards and the amount of time and resources necessary to accommodate the increase in production of the screener would be relatively limited.

Direct Impacts

No direct construction or operational impact to local, or State tax base and tax revenues would be expected with the proposed project because the facility does not offer any services or goods to the local community and will not employ any new employees.

Secondary Impacts

Local, state and federal governments would be responsible for appraising the property, setting tax rates, collecting taxes, from the companies, employees, or landowners benefiting from the proposed operation. Weyerhaeuser would be responsible to accommodate any increased taxes associated with operation of the modified facility. Therefore, any secondary impacts would be negligible to minor, consistent with existing impacted in the affected area, and beneficial. No adverse secondary impacts would be expected because of the proposed project.

Cumulative Impacts

Short-term, beneficial, negligible to minor impacts to local and state tax base and tax revenues are anticipated from this permitting action because the proposed action would increase industrial production at the existing industrial site.

15.Demand for Government Services

This section includes the following resource areas, as required in ARM 17.4.609: Impacts on Demands for Government Services

Affected Environment

The proposed action would take place on an already existing industrial site. The city road that leads to the facility is maintained by the city.

Direct Impacts

State environmental permits have been prepared by state government employees as part of their day-to-day, regular responsibilities. The county already maintains the road to access the mine site and would continue to do so following the proposed action. Therefore, any adverse

direct impacts to demand for government serves would be short-term, consistent with existing impacts and negligible. No beneficial direct impact would be expected because of the proposed action.

Secondary Impacts

After permit issuance, initial and ongoing compliance inspections of facility operations would be accomplished by state government employees as part of their typical, regular duties and required to ensure the facility is operating within the limits and conditions listed in the air quality permit. Therefore, any adverse secondary impacts to demands for government services would be long-term, consistent with existing impacts and negligible. No beneficial secondary impacts would be expected because of the proposed project.

Cumulative Impacts

Minor cumulative impacts are anticipated on government services with the proposed action and a minimal increase in impact would occur, but regulators would likely combine visits to cover regulatory oversight needs.

16.Locally Adopted Environmental Plans and Goals

This section includes the following resource areas, as required in ARM 17.4.609: Impacts on Locally Adopted Environmental Plans and Goals

Affected Environment

A review was conducted on December 8, 2025, to identify any locally adopted environmental plans or goals. No documents were found on the Flathead County public website at https://flatheadcounty.gov/. The infrastructure at the Weyerhaeuser is located in the city of Kalispell and does not indicate a shift in the types of industrial activities occurring in Flathead County.

Direct Impacts

This facility is located on private property, and cadastral layer reflect ownership by Weyerhaeuser. Since no planning documents were identified for Flathead County, DEQ relied on a MTNHP and SHPO data search and review, which did not indicate the activity would create any conflicts with inventoried resources.

Secondary Impacts

Because no environmental plans or goals were identified for Flathead County, it is expected that any secondary impacts from further development of the Weyerhaeuser Kalispell Facility would be consistent with existing growth policy and planning goals of the affected area. Therefore, negligible to minor secondary impacts would be expected because of the proposed project.

Cumulative Impacts

Because no environmental plans or goals were identified for Flathead County, it is expected that any secondary impacts from further development of the Weyerhaeuser Kalispell Facility would be consistent with existing growth policy and planning goals of the affected area. Therefore, negligible to minor cumulative impacts would be expected because of the proposed project.

17.Access to and Quality of Recreational and Wilderness Activities

This section includes the following resource areas, as required in ARM 17.4.609: Impacts on Access to and Quality of Recreation and Wilderness Activities

Affected Environment

The Weyerhaeuser Kalispell Facility is located in the city of Kalispell, MT. The facility is located approximately 23 miles Southwest of Glacier National Park.

Direct Impacts

No direct impacts to access to and quality of recreational and wilderness actives are expected with the proposed action because the affected area is an existing, private industrial site and does not offer wilderness or recreational opportunities.

Secondary Impacts

No secondary or long-term construction and operational impacts are expected because the affected area is an existing, private industrial site and does not offer wilderness or recreational opportunities.

Cumulative Impacts

No cumulative impacts are expected with the proposed action because the affected area is an existing, private industrial site and does not offer wilderness or recreational opportunities.

18.Density and Distribution of Population and Housing

This section includes the following resource areas, as required in ARM 17.4.609: Impacts on Density and Distribution of Population and Housing

Affected Environment

The affected area is mainly industrial with residential homes nearby.

Direct Impacts

No direct impacts from construction or operation are expected because of the proposed action. Weyerhaeuser would employ existing staff and the proposed action would not be expected to otherwise result in an increase or decrease in local population and associated need for additional housing resources.

Secondary Impacts

Weyerhaeuser would employ existing staff to operate the facility, and the proposed action would not be expected to otherwise result in an increase or decrease in the local population. Therefore, no secondary impacts to density and distribution of population and housing would be expected because of the proposed project.

Cumulative Impacts

Weyerhaeuser would employ existing staff to operate the facility, and the proposed action would not be expected to otherwise result in an increase or decrease in the local population. Therefore, no cumulative impacts on the density and distribution of population and housing would be expected because of the proposed action.

19.Social Structures and Mores

This section includes the following resource areas, as required in ARM 17.4.609: Impacts on Social Structures and Mores

Affected Environment

DEQ is not aware of any Native American cultural concerns that would be affected by the proposed activity. Based on the information provided by the State Historical Preservation Office, it is not anticipated that this project would disrupt traditional lifestyles or communities. A State Historical Preservation Office cultural inventory is noted in Section 7 of the EA.

Direct Impacts

No direct impacts to the existing social structures and mores of the affected population would be expected because of the proposed project. The nature of the affected area is largely urban and industrial, and this would not change because of the proposed action. Therefore, ongoing operation of the facility would not be expected to affect the existing customs and values of the affected population.

Secondary Impacts

No secondary impacts to the existing social structures and mores of the affected population would be expected because of the proposed project. The existing nature of the area affected by the proposed project is industrial, which would not change because of the proposed action. Therefore, ongoing operation of the facility would not be expected to affect the existing customs and values of the affected population.

Cumulative Impacts

The existing nature of the area affected by the proposed project is industrial, which would not change because of the proposed action Therefore, it is not anticipated that this project would impact the existing social structures and mores of the local population in the area.

20.Cultural Uniqueness and Diversity

This section includes the following resource areas, as required in ARM 17.4.609: Impacts to Cultural Uniqueness and Diversity

Affected Environment

It is not anticipated that this project would cause a shift in any unique quality of the area. As discussed in Section 7. – Historical and Archaeological Sites, there are no unique resource present in the proposed project area.

Direct Impacts

No direct impacts to existing cultural uniqueness and diversity of the affected area would be expected because of the proposed project. Any activities associated with the proposed action would be consistent with existing activities and would take place within the existing Weyerhaeuser property boundary.

Secondary Impacts

No secondary impacts to existing cultural uniqueness and diversity of the affected area would be expected because of the proposed project. Any activities associated with the proposed action would be consistent with existing activities and would take place within the existing

Weyerhaeuser property boundary.

Cumulative Impacts

No direct impacts to existing cultural uniqueness and diversity of the affected area would be expected because of the proposed project. Any activities associated with the proposed action would be consistent with existing activities and would take place within the existing Weyerhaeuser property boundary.

21. Private Property Impacts

The proposed action would take place on privately-owned land. The analysis below in response to the Private Property Assessment Act indicates no impact. DEQ does not plan to deny the application or impose conditions that would restrict the regulated person's use of private property so as to constitute a taking. Further, because the application was deemed complete, DEQ must take action on the permit pursuant to § 75-2-218(2), MCA. Therefore, DEQ does not have discretion to take the action in another way that would have less impact on private property—its action is bound by a statute. There are private residences in the nearby area of the proposed action. The closest occupied residence is located a few hundred feet away from the project site.

22. Other Appropriate Social and Economic Circumstances

This section includes the following resource areas, as required in ARM 17.4.609: Impacts to Other Appropriate Social and Economic Circumstances

Affected Environment

The proposed action increases the screener production form 962 hrs to 1,500 hrs. No physical changes to the facility are expected due to this action.

Direct Impacts

DEQ is unaware of any other appropriate short-term social and economic circumstances in the affected area that may be directly impacted by the proposed project. Due to the nature of the proposed action, no further direct impact would be expected because of the proposed project.

Secondary Impacts

The proposed project would increase hours of operation of the RDO 616 Screener at the existing plywood and sawmill. Any impact to social and economic circumstances in the affected area would be long-term, minor, and consistent with existing circumstances. DEQ is unaware of any other appropriate long-term social and economic circumstances in the affected area that may be impacted by the proposed project. No further secondary impacts would be expected because of the proposed project.

Cumulative Impacts

No cumulative impacts to any other appropriate social and economic circumstances are anticipated. DEQ is unaware of any other appropriate long-term social and economic circumstances in the affected area that may be impacted by the proposed project.

23. Greenhouse Gas Assessment

Issuance of this permit would authorize Weyerhaeuser to increase the production rate of the RDO

161 Screener from 962 hrs to 1,500 hrs during any 12-month rolling period. This would entail an increase in runtime on the screener which is powered with a small diesel engine.

The analysis area for this resource is limited to the activities regulated by the issuance of MAQP #2602-14, which is the operation of RDO 616 Screener. The amount of diesel fuel utilized at this site may be impacted by a number of factors including seasonal weather impediments and equipment malfunctions. To account for these factors DEQ has calculated the range of emissions using the maximum amount of emissions using 1,500 hour, the maximum allowable hours of operation.

For the purpose of this analysis, DEQ has defined greenhouse gas emissions as the following gas species: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and many species of fluorinated compounds. The range of fluorinated compounds includes numerous chemicals which are used in many household and industrial products. Other pollutants can have some properties that also are similar to those mentioned above, but the EPA has clearly identified the species above as the primary GHGs. Water vapor is also technically a greenhouse gas, but its properties are controlled by the temperature and pressure within the atmosphere, and it is not considered an anthropogenic species.

The combustion of diesel fuel at the site would release GHGs primarily being carbon dioxide (CO_2), nitrous oxide (N_2O) and much smaller concentrations of un-combusted fuel components including methane (CH_4) and other volatile organic compounds (VOCs).

DEQ has calculated GHG emissions using the EPA Simplified GHG Calculator version May 2023, for the purpose of totaling GHG emissions. This tool totals carbon dioxide (CO_2), nitrous oxide (N_2O), and methane (CH_4) and reports the total as CO_2 equivalent (CO_2e) in metric tons CO_2e. The calculations in this tool are widely accepted to represent reliable calculation approaches for developing a GHG inventory. DEQ has determined EPA's Scope 1 GHG impacts as defined in the Inventory Guidance for Greenhouse Gas Emissions are appropriate under MEPA for this Proposed Action. Scope 1 emissions are defined as direct GHG emissions that occur from sources that are controlled or owned by the organization (EPA Center for Corporate Climate Leadership). DEQ's review of Scope 1 emissions is consistent with the agency not evaluating downstream effects of other types of impacts.

This review does not include an assessment of GHG impacts in quantitative economic terms, otherwise known as evaluating the social cost of carbon. DEQ instead calculates potential GHG emissions and provides a narrative description of GHG impacts. This approach is consistent with Montana Supreme Court caselaw and the agency's discussion of other impacts in this EA. *See Belk v. Mont. DEQ*, 2022 MT 38, ¶ 29.

Direct Impacts

Operation of diesel-fueled screener throughout the life of the proposed project would produce exhaust fumes containing GHGs.

Applicant estimates that 1,500 hours of operation per year. To account for variability due to the factors described above, DEQ has calculated the range of emissions using a factor of +/- 10% of the Weyerhaeuser's estimate. Using the Environmental Protection Agency's (EPA) simplified GHG Emissions Calculator for mobile sources, approximately 63.6 metric tons of CO2e would be produced per year.

Secondary Impacts

GHG emissions contribute to changes in atmospheric radiative forcing, resulting in climate change impacts. GHGs act to contain solar energy loss by trapping longer wave radiation emitted from the Earth's surface and act as a positive radiative forcing component (BLM 2021).

Per EPA's website "Climate Change Indicators", the lifetime of carbon dioxide cannot be represented with a single value because the gas is not destroyed over time. The gas instead moves between air, ocean, and land mediums with atmospheric carbon dioxide remaining in the atmosphere for thousands of years, due in part to the very slow process by which carbon is transferred to ocean sediments. Methane remains in the atmosphere for approximately 12 years. Nitrous oxide has the potential to remain in the atmosphere for about 109 years (EPA, Climate Change Indictors). The impacts of climate change throughout the Northwest of Montana include changes in flooding and drought, rising temperatures, and the spread of invasive species (BLM 2021).

Cumulative Impacts

Montana recently used the EPA State Inventory Tool (SIT) to develop a greenhouse gas inventory in conjunction with preparation of a possible grant application for the Community Planning Reduction Grant (CPRG) program. This tool was developed by EPA to help states develop their own greenhouse gas inventories, and this relies upon data already collected by the federal government through various agencies. The inventory specifically deals with carbon dioxide, methane, and nitrous oxide and reports the total as CO_2e. The SIT consists of eleven Excel based modules with pre-populated data that can be used with default settings or in some cases, allows states to input their own data when the state believes their own data provides a higher level of quality and accuracy. Once each of the eleven modules is filled out, the data from each module is exported into a final "synthesis" module which summarizes all of the data into a single file. Within the synthesis file, several worksheets display the output data in a number of formats such as GHG emissions by sector and GHG emissions by type of greenhouse gas.

DEQ has determined the use of the default data provides a reasonable representation of the greenhouse gas inventory for the various sectors of the state, and the estimated total annual greenhouse gas inventory by year. The SIT data from EPA is currently only updated through the year 2021, as it takes several years to validate and make new data available within revised modules. DEQ maintains a copy of the output results of the SIT.

DEQ has determined that the use of the default data provides a reasonable representation of the GHG inventory for all of the state sectors, and an estimated total annual GHG inventory by year. At present, Montana accounts for 50.4 million metric tons of CO_2e based on the EPA SIT for the year 2022. This project may contribute up to 63.6 metric tons per year of CO2e. The estimated emission of 63.6 metric tons of CO2e from this project would contribute 0.00000126% of Montana's annual CO2e emissions.

GHG emissions that would be emitted as a result of the proposed activities would add to GHG emissions from other sources. The No Action Alternative would contribute less than the Proposed Action Alternative of GHG emissions. The current land use of the area is an industrial site.

Description of Alternatives

No Action Alternative: In addition to the proposed action, DEQ must also considered a "no action" alternative. The "no action" alternative would deny the approval of proposed permitting action. The applicant would lack the authority to conduct the proposed activity. Any potential impacts that would

result from the proposed action would not occur. The no action alternative forms the baseline from which the impacts of the proposed action can be measured.

If the applicant demonstrates compliance with all applicable rules and regulations required for approval, the "no action" alternative would not be appropriate.

Other Reasonable Alternative(s): No Alternatives were considered.

If the applicant demonstrates compliance with all applicable rules and regulations as required for approval, the "no action" alternative would not be appropriate. Pursuant to, § 75-1-201(4)(a), (MCA) DEQ "may not withhold, deny, or impose conditions on any permit or other authority to act based on" an environmental assessment.

Consultation

DEQ engaged in internal and external efforts to identify substantive issues and/or concerns related to the proposed project. Internal scoping consisted of internal review of the environmental assessment document by DEQ staff. External scoping efforts also included queries to the following websites/databases/personnel: Application for MAQP # 2602-14, EPA State Inventory Tool, the EPA GHG Calculator Tool, the Montana Natural Heritage Program Website, the State of Montana GIS Mapping Program, the Flathead County website, and the State Historical Preservation office.

Public Involvement

The public comment period for this permit action occurred from December 17, 2025, through December 31, 2025.

Significance of Potential Impacts and Need for Further Analysis

When determining whether the preparation of an environmental impact statement is needed, DEQ is required to consider the seven significance criteria set forth in ARM 17.4.608, which are as follows:

- The severity, duration, geographic extent, and frequency of the occurrence of the impact;
- The probability that the impact will occur if the proposed action occurs; or conversely, reasonable assurance in keeping with the potential severity of an impact that the impact will not occur;
- Growth-inducing or growth-inhibiting aspects of the impact, including the relationship or contribution of the impact to cumulative impacts
- The quantity and quality of each environmental resource or value that would be affected, including the uniqueness and fragility of those resources and values;
- The importance to the state and to society of each environmental resource or value that would be affected;
- Any precedent that would be set as a result of an impact of the proposed action that would commit the department to future actions with significant impacts or a decision in principle about such future actions; and
- Potential conflict with local, state, or federal laws, requirements, or formal plans.

Conclusions and Findings

DEQ finds that this action results in minor impacts to air quality and GHG emissions in Flathead County,

Montana.

The severity, duration, geographic extent and frequency of the occurrence of the impacts associated with the proposed air quality project would be limited. The proposed action would not result in first time disturbance at the Kalispell Facility.

As discussed in this EA, DEQ has not identified any significant impacts associated with the proposed actions for any environmental resource. DEQ does not believe that the proposed activities by the Applicant would have any growth-inducing or growth-inhibiting aspects, or contribution to cumulative impacts. The proposed site does not appear to contain known unique or fragile resources.

There would be negligible to minor impacts to view-shed aesthetics as the site is currently operating as a industrial site. However, because the infrastructure would be installed within the footprint of the existing Weyerhaeuser Kalispell Site, any impacts would be consistent with existing impacts.

Demands on the environmental resources of land, water, air, or energy would not be significant. Impacts to human health and safety would not be significant as access roads would be closed to the public and because the site is on Privately Owned Land. The public would not be allowed on the industrial site.

As discussed in this EA, DEQ has not identified any significant adverse impacts on any environmental resource associated with the proposed activities.

Issuance of a Montana Air Quality Permit to the Applicant does not set any precedent that commits DEQ to future actions with significant impacts or a decision in principle about such future actions If the Applicant submits another modification or amendment, DEQ is not committed to issuing those revisions. DEQ would conduct an environmental review for any subsequent permit modifications sought by the Applicant that require environmental review. DEQ would make permitting decisions based on the criteria set forth in the Clean Air Act of Montana.

Issuance of the Permit to the Applicant does not set a precedent for DEQ's review of other applications for Permits, including the level of environmental review. The level of environmental review decision is made based on case-specific consideration of the criteria set forth in ARM 17.4.608.

Finally, DEQ does not believe that the proposed air quality permitting action would have any growth-inducing or growth inhibiting impacts that would conflict with any local, state, or federal laws, requirements, or formal plans.

Based on a consideration of the criteria set forth in ARM 17.4.608, the proposed project is not predicted to significantly impact the quality of the human environment. Therefore, preparation of an EA is the appropriate level of environmental review pursuant to MEPA.

PREPARATION

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Approved By:

December 16, 2025

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Date

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