



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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November 3, 2020

Christos Christoforou
Northwest Clean Air Agency
1600 S. 2nd Street
Mt. Vernon, WA 98273

Re: Second Tier Petition by Silvastar Forest Products, Ferndale, Washington

Dear Christos Christoforou:

The Washington Department of Ecology's Air Quality Program (Ecology) has completed a review of health risks associated with acetaldehyde, acrolein, and formaldehyde emissions from three lumber dry kilns at Silvastar Forest Products (Silvastar) in Ferndale, Washington.

Silvastar previously received a permit from Northwest Clean Air Agency (NWCAA) to install and operate three lumber dry kilns, but these kilns were only allowed to operate at a fraction of their production capacity. To make full use of their lumber kilns, Silvastar proposes to increase annual throughput from 519,000 board feet (0.519 MMbf/yr) to 40 MMbf/yr.

Ecology's review indicates that increased toxic air pollutant (TAP) emissions from the proposed project could result in an increased cancer risk of about two in one million (2×10^{-6}) at a maximally impacted residential location north of Silvastar. Ecology allows an increased risk of up to 10 in one million (1×10^{-5}) under second tier toxics review.

Ecology also determined that Silvastar's proposed TAP emissions are not likely to contribute to short- and long-term respiratory hazards for people living or working near the facility.

Based on the review of Silvastar's second tier petition, Ecology recommends approval of the proposed project because project-related health risks are permissible under WAC 173-460-090, and the project has satisfied all requirements of a second tier analysis. NWCAA can incorporate our findings as part of the ambient air impacts analysis and begin the public comment period when appropriate.

If you would like to discuss this project further, please contact Gary Palcisko at 360-407-7338 or gary.palcisko@ecy.wa.gov.

Sincerely,

Chris Hanlon-Meyer
Science and Engineering Section Manager
Air Quality Program

Enclosure