From:	Thomas Card
To:	Gardner, Valerie; "JD Mann"; Sheldon Howell
Cc:	Glass, Geoffrey; Pepple, Karl
Subject:	RE: YFP Pre-Draft Title V Permit Review
Date:	Tuesday, August 5, 2025 12:10:53 PM
Attachments:	YFP 2025 Title V DRAFT Permit Review 01.docx

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Valerie:

Sorry for the delay, our comments are in the attached document.

Thank you.

Tom Card

Environmental Management Consulting
41125 278th Way SE, Enumclaw, WA 98022 USA
360-802-5540 (Cell) 425-417-2420
trcard@EnvManCon.com

From: Gardner, Valerie <Gardner.Valerie@epa.gov>
Sent: Monday, August 4, 2025 7:35 AM
To: Thomas Card <trcard@envmancon.com>; 'JD Mann' <jd@yakama-forest.com>; Sheldon Howell <sheldon@yakama-forest.com>
Cc: Glass, Geoffrey <GLASS.GEOFFREY@EPA.GOV>; Pepple, Karl <Pepple.Karl@epa.gov>
Subject: RE: YFP Pre-Draft Title V Permit Review

Good morning all,

I'm following up on the YFP title V pre-draft review. We were expecting to receive input regarding the below items, as well as any other comments. Since we are aiming to initiate the public notice process this week, receiving your feedback as soon as possible is crucial for us to proceed as planned. Could you please let us know when we should expect pre-draft comments?

Thank you,

Valerie Gardner
Environmental Engineer

U.S. EPA, Region 10
Alaska Operations Office
Main: (907) 271-6561 | gardner.valerie@epa.gov

From: Gardner, Valerie
Sent: Monday, July 21, 2025 9:27 AM
To: robert@yakama-forest.com; trcard@envmancon.com
Cc: Glass, Geoffrey <GLASS.GEOFFREY@EPA.GOV>; Pepple, Karl <Pepple.Karl@epa.gov>
Subject: YFP Pre-Draft Title V Permit Review

Good morning,

Please find attached the YFP pre-draft title V permit (R10T5120200) and statement of basis for your review. Please provide all comments by the end of the day on August 1, 2025. The main changes in the permit include removing boiler #2, re-numbering the LLM kilns from #5-11 to #1-7, and revising the submittals condition to include electronic submittals.

There are several items highlighted throughout the documents. Could you please confirm the following:

1. Should Sheldon Howell be listed as both the responsible official and company contact? If so, could you provide his email address and forward along these documents?
2. I used the same SO2 emission factor for the boilers as the previous title V renewal. This is a conservative approach, provides a bit more flexibility, and does not have an effect on any permitting conditions. Please let me know if you would prefer to revise this factor to align with the permit application.
3. For the kilns, I calculated PM2.5 using the same emission factor as PM and PM10 (PM2.5 was not included in the permit application). Additionally, the permit application uses the sum of all production to calculate PTE. Previously, only the largest maximum production was used since these values are understood to be the maximum amount that can be dried if only that species is dried all year. Again, this approach is extremely conservative, but does not have an effect on any permitting conditions.
4. For bin SD-2, the application notes that this bin routes to cyclone C-2. The fugitive emissions were calculated for SD-2 previously, however if it is routed, then we can removed those. Please confirm.
5. For the miscellaneous non-fugitive activities, can you confirm that the annual capacity for the SLM will remain the same as the previous permit renewal?
6. For the miscellaneous fugitive activities, I believe the debarking emission factors should be similar to the hog rather than sawing. Also, could you please confirm the log yard's acreage for wind erosion? The previous permit renewal used 90 acres, but the application uses 17 acres for the SLM and 7 acres for the LLM.

I'd like to set up a quick call to discuss the permit once you've had time to look it over. I'm fairly free on Wednesday and Thursday, so please let me know if any time during those days works for you.

Thank you,

Valerie Gardner
Environmental Engineer
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