VR. 435205 V. 2

Ken

Weyerhaeuser

P.O. Box 1106
Hot Springs, Arkansas 71902

25 January 1993

Mr. J.B. Jones
Chief, Air Division
Arkansas Department of Pollution Control and Ecology
P.O. Box 8913
Little Rock, Arkansas 72219-8913

RE: Draft Permit 023-AR-3
Weyerhaeuser, Dierks, Arkansas

Dear Mr. Jones:

These comments are submitted on behalf of Weyerhaeuser with respect to the above draft permit.

Specific Conditions 5 and 6: This condition relates to boiler steam production rates. Since the demand on the boilers is not constant, there may be times when the instantaneous steam production rate may be slightly in excess of the amounts stated. The attached letter shows that the boiler is rated up to 160,000 pounds per hour. An averaging period of four hours is suggested. This would be in keeping with the normal boiler rating process which allows for minor excursions so long as longer term averages and annual production remain below rated load capacity.

Specific Conditions 7 and 8: It should be noted that this production rate is an average of lumber produced over a normal kiln drying schedule. Because there are factors such as weather conditions and ambient temperatures which may influence exact drying time for a specific kiln charge as well as size of lumber being dried, and the process is continuous batch, we request that these hourly production rates be applied to a thirty day average. Alternatively, a higher maximum one hour rate of 9.0 MBF per hour for kilns 1, 2, and 4 and 4.5 MBF per hour for kiln number 3 with no change to annual limits could reflect actual conditions encountered.

Specific Conditions 9 and 11: It should be noted that the measure contemplated in the permit application and for which records are kept is "thousand square feet, 3/8" basis or M 3/8". To eliminate confusion, this should be so stated. Records are not maintained on an hourly basis for these units. We request that the hourly maximums and recordkeeping be applied to a seven day average supported by weekly records as noted below.

Specific Condition 12: The permittee reads this condition to apply to fugitive emissions from process or pollution control sources and not to apply to such conditions as dust storms or "rooster tails" from vehicle traffic.

Weyerhaeuser FIFTY YEARS America's First Tree Farm

Specific Condition 9: The maximum production for the veneer dryer has historically been 23.9 MSF(3/8" basis) per hour over a one week period. Since the dryer is limited by the operating hours of the gas burners i.e. 6.33 days per week we propose the dryer should be limited to the same hours. This yields a slight reduction in yearly potential to emit from the dryer. We will provide a revised Table 1

Specific Condition 11: The plywood presses do not always operate on the same schedule as the dryer although their production is limited by the dryer. We, however compute production on a unit per operating hour basis. This often can result in a higher rate per hour for fewer operating hours or for specific product mixes. It would be appropriate to change this to a maximum of 30.8 MSF(3/8" basis) per hour on a weekly basis with yearly rates as specified in the draft permit for the veneer dryer and presses. This also reduces the yearly potential to emit.

Table I: SN32 has an opacity of 40% specified. Please verify that this is the correct value. SN22 should read #1 Planer rather than #9 Planer.

We appreciate this opportunity to submit comments and look forward to discussing these items with you if further clarification is necessary. If you have any questions, please feel free to have your staff call me at (501) 624-8569.

Very truly yours,

Jess R. Walrath, Jr.
Environmental Affairs Manager

c: R. Endicott
K. Kostka
A. Shar

Area Code 717 326-3361

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E. KEELER COMPANY

238 West Street — Williamsport, Pennsylvania 17701

Manufacturers of KEELER WATER TUBE BOILERS

FABER COMBUSTION SYSTEMS

January 25, 1978

Weyerhaeuser Corporation
P.O. Box 38
Dierks, AR 71833

Attention: Mr. Elmer Renken

Subject: Keeler Contract #15769
130,000 PPH Water Tube Boiler

Dear Mr. Renken:

Gordon Villesvik of your West Coast office asked me to drop you a note concerning maximum capacity on the subject boiler.

As you know, this boiler was sold for a maximum continuous capacity of 130,000 PPH. This capacity was primarily based on the minimum furnace volume, minimum heating surface, minimum grate area, and maximum flue gas velocities required for waste wood firing. Disregarding these fireside design criteria, we find that the circulation and other waterside design parameters are adequate for loads up to 160,000 PPH.

The waste gas fuel used in this unit would naturally require less excess air and less furnace volume than waste wood. Also, the waste wood design criteria accounted for 50% moisture in the fuel which required a larger furnace volume because of the associated reduced efficiency. Considering these items, the unit fireside conditions are probably also suitable for the higher capacity mentioned above. It would be wise to obtain verification of this opinion from the fuel burning equipment manufacture (The McBurney Corporation). They know more about the waste gas and its combustion characteristics than we do.

Please note that we have not addressed fireside erosion, water quality or combustion conditions. Obviously, all of these items would be of concern to you when capacities greater than rated are anticipated, but we consider all of them operating parameters rather than design parameters.

If we can be of further help, please advise.

Very truly yours,

E. KEELER COMPANY

D. E. McCoy

Daniel E. McCoy
Chief Engineer

DEM/kal

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