



November 24, 2010

By Email (Inahara.Jill@deq.state.or.us)

Ms. Jill Inahara
Oregon DEQ, Air Quality Division
811 Southwest Sixth Avenue
Portland, Oregon 97204

RE: Comments on the Proposed PM_{2.5} and Greenhouse Gas Regulations

Dear Ms. Inahara:

Weyerhaeuser Company has long been a strong proponent of cost effective air regulations in Oregon that both result in benefits to the environment while also providing for jobs in the Oregon communities in which we do business. Given this we are very supportive of the November 24, 2010 comments submitted by Associated Oregon Industries (AOI) to the Oregon Department of Environmental Quality (DEQ) concerning the PM_{2.5} and greenhouse gas rule revisions.

We believe the comments submitted by AOI are consistent with our views of how best to regulate PM_{2.5} and greenhouse gases. As such we urge the Environmental Quality Commission to adopt these suggested comments from AOI.

In addition, there is one point in particular in the AOI comments that we wish to again emphasize. The longstanding Oregon Plant Site Emission Limit (PSEL)/New Source Review (NSR) program is valuable and worthy of mention relative to these particular rule revisions.

Oregon has excluded changes from PSD when these changes can be accommodated under a PSEL. This has encouraged sources to decrease emissions knowing that they could benefit the environment in a manner that does not damage a company's potential for future growth. In addition; by way of the Oregon PSEL/NSR program and its Type 1 through Type 4 Notice of Construction thresholds, the program provides sources with an understandable and therefore manageable means by which to compliantly address applicable changes at a source and with the added benefit of often remaining out of PSD or NSR. Clearly this is advantageous to both the air shed and the sources that reside there.

Therefore we strongly urge the Environmental Quality Commission to allow PM_{2.5} and greenhouse gases to be managed by way of the Oregon PSEL/NSR program. Failing to do so arguably undermines the integrity of this valuable program and presents the opportunity for significant compliance confusion both within the regulated community and Oregon DEQ.

As always we appreciate the opportunity to respectfully submit these comments to you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dale F. Wonn'.

Dale F. Wonn

Environmental Manager
Weyerhaeuser NR Company

c: Jack Carter / Weyerhaeuser NR Company / Environmental Manager
John Ledger / AOI / Vice President