

West Virginia Department of Environmental Protection

*Earl Ray Tomblin
Governor*

Division of Air Quality

*Randy C. Huffman
Cabinet Secretary*

Permit to Modify



R13-1622I

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45 C.S.R. 13 — Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:

Georgia Pacific Wood Products, LLC
Mt. Hope Facility
019-00034

*John A. Benedict
Director*

Issued: DRAFT • Effective: DRAFT

This permit will supercede and replace Permit R13-1622H.

Facility Location: Mt. Hope, Fayette County, West Virginia

Mailing Address: 79 N. Pax Avenue
Mt. Hope, WV 25880

Facility Description: Oriented Strand Board (OSB) manufacturing facility

SIC Codes: 2421, 2493

UTM Coordinates: 483.5 km Easting • 4,194.5 km Northing • Zone 17

Permit Type: Modification

Description of Change:

Addition of 3 emission sources that have been present at the facility since original construction.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

The source is subject to 45CSR30. Changes authorized by this permit must also be incorporated into the facility's Title V operating permit. Commencement of the operations authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.

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1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
Wellons Energy System OSB Rotary Dryers (3)	5600	Woodwaste-fired energy/dryer, providing heat for drying of the wood flakes in the rotary dryers, as well as the Thermal Oil System for the press operation.	1995	240 MMBtu/hr 45 OD tons/hr	WES-1 UI-1 ESP
Auxiliary Thermal Oil Heater	3600	Natural gas burner used to heat the thermal oil during times when the Wellons unit is not in operation.	1995	45 MMBtu/hr	None
Forming Line System	6800	Form mats from the material from the blenders to be sent to the press operations.	1995	50 MSF/hr	FF2
Mat Trim System	6900	Cross-cut saws trim 24-ft formed mats prior to press operations.	1995	50 MSF/hr	FF3
Board Press Area	7890	Mats from Former are subjected to heat and pressure, and cured to form OSB.	1995	50 MSF/hr	RTO/RCO
Edge Seal Paint Booth	8830/8835	Paint booth in which a water-based latex paint is applied to finished OSB.	1995	15 gallons/hr	FF4
Finishing Area	8900	Oriented Strand Board trimming operations; tongue and groove operations	1995	69 MSF/hr	FF5
Trim Waste Material Transfer System	8950	Trim material from the Former Area, Mat Trim, and Finishing operations are collected and transferred to the high efficiency cyclone (HEC1) for deposition in the Dry Fuel Silo.	1995	69 MSF/hr	HEC1
Dry Fuel Silo	8950	Enclosed Dry Fuel Silo which contains material collected from the Former Area, Mat Trim, and the Finishing Area	1995	10,500 ft ³	None
Sanding Area	9500	Sanding operations.	1995	36 MSF/hr	FF6

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
Sanderdust Transfer System	9600	Collects dust from sanding operations and pneumatically transfers the dust to the high efficiency cyclone for deposition into the Sander Dust Fuel Silo	1995	36 MSF/hr	HEC2
Sander Dust Fuel Silo	9600	Enclosed Sander Dust Fuel Silo	1995	4,600 ft ³	None
Screen Fines Transfer System	8960	Collects fines from the screening operation after the dryers, and pneumatically transfers this material to the fabric filter for deposition into the Dry Fuel Silo.	1999	7.9 tons/hr	FF7
Screening Building Dedust System	8970	Collects material from the screening operation within the screening building and pneumatically transfers this material to the fabric filter for deposition into the Dry Fuel Silo	1999	2.7 tons/hr	FF8
Bark Hog	2230	Bark grinder which acts as an integral part of the waste wood system.	1995	27 tons/hr	None
Log Debarker	1050	Two (2) ring debarkers used to remove bark from logs.	1995	90 tons/hr	None
Log Flakers	2000	Two (2) Long Log Flakers are used to flake the debarked logs.	1995	75 tons/hr	None
Thermal Oil Storage Tank	3990	15,000 gallon storage tank for the Thermal Oil System.	1995	N/A	None
8010	8010	Nail Line Applicator	2000	N/A	None
6000	6000	Blenders (2)	1995	46.5 ODT/hr	None
Log Deicing	Fugitive	Log Deicing/Conditioning	1995	90 TPH	None
RICE-1	RICE-1	Firewater Pump Engine	1995	255 HP	None

CONTROL EQUIPMENT

Control Device	Control Device ID	Control Device Description	Year Installed	Emissions Unit ID
Electrostatic Precipitator	ESP	Electrostatic Precipitator controlling particulate matter emissions from the Wellons	1995	5600: Wellons
Fabric Filter	FF2	Fabric filter system controlling the collection of material from the Former Area. Collected material from the Former Area dust collection system enters a cyclone via air stream, with exiting air entering the fabric filter for particulate control. 99.9% control efficiency. This material is then pneumatically transferred to the Dry Fuel Silo.	1995	6800: Former Area
Fabric Filter	FF3	Fabric filter system controlling the collection of trim material from the cross-cut saws. Collected material enters a cyclone via air stream, with exiting air entering the fabric filter for particulate control. 99.9% control efficiency. This material is then pneumatically transferred to the Dry Fuel Silo.	1995	6900: Mat Trim
Fabric Filter	FF5	Fabric filter system controlling the collection of trim material from board trimming operations (Finishing Area). 99.9% control efficiency. This material is then pneumatically transferred the Dry Fuel Silo.	1995	8900: Finishing Area
Cyclone	HEC1	High Efficiency Cyclone controlling the transfer of material from the Former Area, Mat Trim, and Finishing Area operations to the Dry Fuel Silo. 99.9% control efficiency.	1995	8950: Former Area, Mat Trim, and Finishing Area
Fabric Filter	FF6	Fabric filter system controlling the collection of trim material from the sanding operations. 99.9% control efficiency. This material is then transferred to the Sander Dust Fuel Silo.	1995	9500: Sanding Area
Cyclone	HEC2	High Efficiency Cyclone controlling the transfer of material from the Sanding Area material collection system to the Sander Dust Fuel Silo. 99.9% control efficiency.	1995	9600: Sander Dust Transfer System
Fabric Filter	FF7	Fabric filter system controlling the collection of screen fines from the screening operations preceding the dryers. 99.9% control efficiency. Material is then pneumatically transferred to the Dry Fuel Silo.	1999	8960: Screen Fines Pneumatic Transfer System

Control Device	Control Device ID	Control Device Description	Year Installed	Emissions Unit ID
Fabric Filter	FF8	Fabric filter system controlling the collection of screen fines from the screen drums within the screening building. Material is then pneumatically transferred to the Dry Fuel Silo.	1999	8970: Screening Bldg Dedust
Fabric Filter	FF4	Fabric filter controlling the overspray in the listed paint booth.	1995	8830/8835: Edge Seal Paint Booth
RTO/RCO		Regenerative oxidizer which can operate in either thermal or catalytic modes. Controls the OSB Press	2008	7890

2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45 CSR § 30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	NO_x	Nitrogen Oxides
CBI	Confidential Business Information	NSPS	New Source Performance Standards
CEM	Continuous Emission Monitor	PM	Particulate Matter
CES	Certified Emission Statement	PM_{2.5}	Particulate Matter less than 2.5µm in diameter
C.F.R. or CFR	Code of Federal Regulations	PM₁₀	Particulate Matter less than 10µm in diameter
CO	Carbon Monoxide	Ppb	Pounds per Batch
C.S.R. or CSR	Codes of State Rules	pph	Pounds per Hour
DAQ	Division of Air Quality	ppm	Parts per Million
DEP	Department of Environmental Protection	Ppmv or ppmv	Parts per million by volume
dscm	Dry Standard Cubic Meter	PSD	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	psi	Pounds per Square Inch
HAP	Hazardous Air Pollutant	SIC	Standard Industrial Classification
HON	Hazardous Organic NESHAP	SIP	State Implementation Plan
HP	Horsepower	SO₂	Sulfur Dioxide
lbs/hr	Pounds per Hour	TAP	Toxic Air Pollutant
LDAR	Leak Detection and Repair	TPY	Tons per Year
M	Thousand	TRS	Total Reduced Sulfur
MACT	Maximum Achievable Control Technology	TSP	Total Suspended Particulate
MDHI	Maximum Design Heat Input	USEPA	United States Environmental Protection Agency
MM	Million	UTM	Universal Transverse Mercator
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour	VEE	Visual Emissions Evaluation
MMCF/hr or mmcf/hr	Million Cubic Feet per Hour	VOC	Volatile Organic Compounds
NA	Not Applicable	VOL	Volatile Organic Liquids
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Law W.Va. Code §§22-5-1 et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

2.4. Term and Renewal

- 2.4.1. This permit supercedes and replaces previously issued Permit R13-1622H. This permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any applicable legislative rule.

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-1622, R13-1622R, R13-1622A, R13-1622B, R13-1622C, R13-1622D, R13-1622E, R13-1622F, R13-1622G, R13-1622H, R13-1622I and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to; **[45CSR§§13-5.11 and 13-10.3]**
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-4]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-5.4.]

2.10. Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.

[45CSR§13-5.1]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission

limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are not met.
- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and,
 - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emission, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1]

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45 C.S.R. 11.
[45CSR§11-5.2.]

3.2. Monitoring Requirements

[Reserved]

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in

this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
- d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
 1. The permit or rule evaluated, with the citation number and language;
 2. The result of the test for each permit or rule condition; and,
 3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.
- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§4. State-Enforceable only.]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304-2345

If to the USEPA:

Associate Director
Office of Enforcement and Permits Review
(3AP12)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. **Operating Fee.**

- 3.5.4.1. In accordance with 45CSR30 – Operating Permit Program, the permittee shall submit a Certified Emissions Statement (CES) and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.
- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

4.1.1. Emissions to the atmosphere from the process emission points below shall not exceed the following:

Emission Point	Source	Controlled Emission Rate (lb/hr)					
		CO	HCHO	NO _x	PM	SO ₂	VOC
5600	Wellons	48.00	1.00	50.00	24.00	4.80	3.00
6800	Former Area	---	---	---	1.03	---	---
6900	Mat Trim	---	---	---	0.59	---	---
8830	Edge Seal Paint Booth	---	---	---	0.10	---	---
8835	Edge Seal Paint Booth	---	---	---	0.10	---	---
8900	Finishing Area	---	---	---	0.98	---	---
8950	Silo	---	---	---	0.44	---	---
9500	Sanding Area	---	---	---	1.03	---	---
9600	Silo	---	---	---	0.30	---	---

4.1.2 Emissions from the OSB board press and RTO/RCO shall not exceed:

Pollutant	Emissions	
	lb/hr	tpy
PM	12.1	46
CO	24.8	94.2
NO _x	7.5	28.5
VOCs (as Carbon)	3.7	14.2
Acetaldehyde	0.21	0.8
Formaldehyde	5.4	20.4
Methanol	5.8	21.9
Phenol	0.4	1.4
Total HAPs (as Carbon)	3.7	14.2

4.1.2.1. VOC and Total HAP emissions limits in table 4.1.2 are based on EPA Method 25 and expressed on an as Carbon basis. All other emissions are on a mass basis for that specific pollutant.

- 4.1.3 In order to minimize the generation of fugitive dust emissions from plant roadways, the permittee shall pave all plant roadways and sweep said roadways as necessary. The permittee shall take care to ensure that all vehicles and equipment observe the posted 10 mph speed limit referenced in Permit Application number R13-1622.
- 4.1.4. In order to minimize the generation of fugitive particulate emissions from conveyors, the permittee shall fully enclose all conveyors except the conveyor that transfers bark from the debarkers to the bark storage pile referenced in Permit Application number R13-1622.
- 4.1.5 The permitted facility shall burn only wood waste as the primary fuel in the Wellons Fuel Cell (Emission point 5600). Alternative fuels may be used only after receiving prior written approval from the Director of the Division of Air Quality.
- 4.1.6 For the purpose of disposing specified process-related waste materials, the permittee may utilize the process of combustion within the Wellons Unit for such disposal, after blending such wastes with dry fuel feed from the dry fuel silo. The permittee may dispose of the following wastes through the process of combustion in the Wellons Unit:
- Waste water and waste water sludge
 - Paint solids
 - Wax and resin wastes
 - Oil and oil contaminated materials (sawdust, rags, etc.)•Other wood wastes (bark, trimmings, sawdust, etc.).
- 4.1.7. Natural gas-fired oil heaters are to be used for auxiliary purposes only. Natural gas shall not be used during normal operating conditions of the Wellons Energy Unit.
- 4.1.8 The facility shall use powdered resin formulations for the production of oriented strand board. The two different resin formulations which are used in the core and the surface layers of the board mats are to contain no more than 0.4% and 0.1% free formaldehyde respectively.
- 4.1.9 Resin consumption rates for the OSB facility are not to exceed 772 tons per month, and 9,264 tons per year.
- 4.1.10 An urea injection system shall be installed to control emissions from the Wellons Energy System.
- 4.1.11 The owner or operator of the facility shall comply with the following amended provisions applicable to the Wellons Unit (emission point 5600):
- 4.1.11.a Particulate matter emissions from the Wellons Energy Unit (emission point 5600) shall not exceed 0.10 lb/million Btu, and the opacity shall not exceed the limits set forth in 45CSR7 as measured by the procedures set forth in 45CSR7A.
 - 4.1.11.b The particulate matter emission and opacity standard set forth above shall apply at all times except during periods of startup, shutdown, or malfunction.
- 4.1.12 The facility shall comply with all applicable provisions of 40 CFR 63 subpart DDDD.

4.1.13 Emissions from the OSB Board Press shall be controlled by RCO/RTO-1.

4.1.13.1.a Prior to the initial performance test, when the control device is operating in thermal mode the permittee must maintain the 3 hour block average firebox temperature above 1500°F. After the initial performance test the permittee must maintain the 3 hour block average firebox temperature above the minimum temperature established during the initial performance test or at a lower temperature established during a subsequent performance test where the requirements of the PCWP MACT were met.

4.1.13.1.b Prior to the initial performance test, when the control device is operating in catalytic mode the permittee must maintain the 3 hour block average catalytic oxidizer temperature above 800°F. After the initial performance test the permittee must maintain the 3 hour block average firebox temperature above the minimum temperature established during the initial performance test or at a lower temperature established during a subsequent performance test where the requirements of the PCWP MACT were met. Additionally, the permittee must check the activity level of a representative sample of the catalyst at least every 12 months.

4.1.14 In order to meet 40 CFR 63 Subpart DDDD the applicant shall meet at least one of the following conditions:

4.1.14.a RCO/RTO-1 shall reduce emissions of total HAPs, measured as THC (as carbon) by at least 90%.

4.1.14.b Emissions of total HAPs from RCO/RTO-1 measured as THC (as carbon) shall not exceed 20 ppmvd.

4.1.14.c RCO/RTO-1 shall reduce emissions of methanol, by at least 90%.

4.1.14.d Emissions of methanol from RCO/RTO-1 shall not exceed 1 ppmvd if uncontrolled methanol emissions entering the control device are greater than or equal to 10 ppmvd.

4.1.14.e RCO/RTO-1 shall reduce emissions of formaldehyde, by at least 90%.

4.1.14.f Emissions of formaldehyde from RCO/RTO-1 shall not exceed 1 ppmvd if uncontrolled methanol emissions entering the control device are greater than or equal to 10 ppmvd.

4.1.15 Emissions from the two blenders (combined) shall not exceed:

	Lb/hr	TPY
PM/PM ₁₀ /PM _{2.5}	0.12	0.51
VOC	9.23	35.04
Formaldehyde	0.21	0.79
Methanol	3.64	13.80
Total HAPs	3.84	14.59

4.1.16 Emissions from the Log Deicing/Conditioning system shall not exceed the following:

	Lb/hr	TPY
VOC	5.14	22.49
Acetaldehyde	0.32	1.42
Methanol	0.51	2.22
Total HAPs	0.83	3.64

4.1.17 Emissions from the Firewater Pump Engine shall not exceed the following:

	Lb/hr	TPY
PM/PM ₁₀ /PM _{2.5}	0.56	0.14
NO _x	7.91	1.98
CO	1.70	0.43
SO ₂	0.52	0.13
VOC	0.64	0.16
Total HAPs	0.99	0.25

4.1.18 Annual production of Oriented Strand Board (OSB) shall not exceed 407, 340 oven dried tons per year nor 438 million square feet per year (3/8" basis) based on a 12 month rolling total.

4.1.19 Operation of the firewater pump engine shall not exceed 500 hours per year based on a 12 month rolling total.

4.1.20 **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.

[45CSR§13-5.11.]

4.2. Testing Requirements

- 4.2.1. The owner or operator of the facility shall comply with the following provisions applicable to the Wellons Unit (emission point 5600).
- 4.2.1.a Emissions in excess of the limits stated in 4.1.1 and 4.1.11 during periods of startup, shutdown, and malfunction shall not be considered a violation.
 - 4.2.1.b Performance tests shall be conducted under such conditions as the Director shall specify to the plant operator based on representative performance of the Wellons Energy Unit.
 - 4.2.1.c Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.
 - 4.2.1.d The owner or operator of the facility shall provide, or cause to be provided, performance testing facilities as follows:
 - 4.2.1.d.1 Sampling ports adequate for test methods applicable to such facility. This includes constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and procedures and providing a stack or duct free of cyclonic flow during performance tests.
 - 4.2.1.d.2 Safe sampling platform(s).
 - 4.2.1.d.3 Safe access to sampling platform(s).
 - 4.2.1.d.4 Utilities for sampling and testing equipment.
- 4.2.2 At such other times as may be required by the Administrator or the Director, the permittee shall conduct a performance test to demonstrate compliance with the emission rates for Emission Point 5600 listed in 4.1.1 of this permit. The test methods to be utilized are as follows:

Pollutant	Test Method
CO	EPA Method 10
Formaldehyde	EPA Method 0011, 320 or as approved by the Director
NO _x	EPA Method 7, 7A, 7B, 7C, or 7D
PM	EPA Method 5
SO ₂	EPA Method 6, 6A
VOC	EPA Method 25 or 25A

The test methods specified for CO, NO_x, PM, SO₂, VOC and are found in 40CFR60 Appendix A. Alternate test schedules and/or test methods may be utilized if approval is granted by the Director upon written request of the permittee.

4.3. Monitoring and Recordkeeping Requirements

- 4.3.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:
- a. The date, place as defined in this permit and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of the analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
- 4.3.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
- 4.3.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
- a. The equipment involved.
 - b. Steps taken to minimize emissions during the event.
 - c. The duration of the event.
 - d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
 - f. Steps taken to correct the malfunction.
 - g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.
- 4.3.4. The owner or operator of the facility shall comply with the following provisions applicable to the Wellons Unit (emission point 5600).

- 4.3.4.a The permittee shall install, calibrate, maintain, and operate a continuous monitoring system for measuring the opacity of emissions discharged to the atmosphere and record the output of the system.
- 4.3.4.b For the purpose of determining compliance with the maximum emission rate limit stated in condition 4.1.12, the permittee shall record and maintain records of the amounts of each fuel combusted during each day for the determination of an annual emission rate.
- 4.3.4.c The facility must maintain records attesting to the occurrence and duration of any startup, shutdown, or malfunction in the operation of the Wellons Energy Unit; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.
- 4.3.4.d The facility shall maintain a file of all measurements, including continuous opacity monitoring system, required pollutant monitoring device, and performance testing measurements; all continuous opacity monitoring system performance evaluations; all continuous opacity monitoring system or required pollutant monitoring device calibration checks; adjustments and maintenance performed on these systems or devices.
- 4.3.4.e Unless otherwise approved by the Director, the following procedures shall be followed for continuous monitoring systems measuring opacity of emissions. Minimum procedures shall include a method for producing a simulated zero opacity condition and an upscale (span) opacity condition using a certified neutral density filter or other related technique to produce a known obscuration of the light beam. Such procedures shall provide a system check of the analyzer internal optical surfaces and all electronic circuitry including the lamp and photo detector assembly.
- 4.3.4.f Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all continuous monitoring systems shall be in continuous operation and shall meet minimum frequency of operation requirements.
- 4.3.4.g All continuous monitoring systems for measuring opacity of emissions shall complete a minimum of one cycle of sampling and analyzing for each successive 15-second period.
- 4.3.5 For the purpose of determining compliance with 4.1.5 and 4.1.7, the facility shall maintain monthly certified records using the sample record keeping form originally appended to permit R13-1622C as Attachment A. Alternatively the permittee may propose to the Director a different form of record keeping from that appended as ATTACHMENT A. All records are to be initialed by the "Responsible Official", using the space provided in ATTACHMENT A, within ten (10) days after the end of each calendar month. The CERTIFICATION OF DATA ACCURACY, appearing on the reverse side of ATTACHMENT A, must be completed by a "Responsible Official" within fifteen (15) days after the end of each calendar year. In the event the permittee should substitute its own record keeping form for ATTACHMENT A, the CERTIFICATION OF DATA ACCURACY must be copied to the reverse side and properly completed within the time frame referenced above. This information shall be maintained on-site for a period of no less than five (5) years and made available to the Director or his duly authorized representative upon request.

- 4.3.6 For the purpose of determining compliance with the resin formulation and maximum resin consumption limitations established in 4.1.8 and 4.1.9, the facility shall maintain monthly certified records using the sample record keeping form originally appended to permit R13-1622C as Attachment B. Alternatively the permittee may propose to the Director a different form of record keeping from that appended as ATTACHMENT B. All records are to be initialed by the “Responsible Official”, using the space provided in ATTACHMENT B, within ten (10) days after the end of each calendar month. The CERTIFICATION OF DATA ACCURACY, appearing on the reverse side of ATTACHMENT B, must be completed by a “Responsible Official” within fifteen (15) days after the end of each calendar year. In the event the permittee should substitute its own record keeping form for ATTACHMENT B, the CERTIFICATION OF DATA ACCURACY must be copied to the reverse side and properly completed within the time frame referenced above. This information shall be maintained on-site for a period of no less than five (5) years and made available to the Director or his duly authorized representative upon request.
- 4.3.7 The permittee shall install, calibrate, maintain and operate a continuous monitoring system for measuring the opacity of emissions discharged to the atmosphere from Emission Point 5600 and record the output of the system. Said continuous monitoring system shall meet the requirements of Performance Specification 1 found in 40 CFR 60 Appendix Bin existence at the time of installation, replacement or refurbishment of the COM.
- 4.3.8 In order to determine compliance with the annual emission limits of 4.1.15 and 4.1.16 of this permit and the production limits of 4.1.18 of this permit, the permittee shall maintain records of the amount of OSB produced at the facility on a monthly basis.
- 4.3.9 In order to determine compliance with the annual emission limits of 4.1.17 of this permit and the usage limits of 4.1.19 of this permit, the permittee shall maintain records of the number of hours the firewater pump engine is used on a monthly basis.

4.4. Reporting Requirements

- 4.4.1. The permittee shall submit to the Director excess emission reports, on a calendar quarter basis, during which there are excess emissions from the facility. If there are no excess emissions during the calendar quarter, the permittee shall submit a report semiannually stating that no excess emissions occurred during the semiannual reporting period. Excess emissions are herein defined as, during any 60-minute period, more than 20 opacity readings (15-second intervals) exceeding 20% and any single opacity reading exceeding 40%. All reports shall be postmarked within 30 days following the end of each calendar quarter. All written reports of excess emissions shall include the following information:
- 4.4.1.a The magnitude of excess emissions, any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions.
- 4.4.1.b Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction, the corrective action taken or preventative measures adopted.

- 4.4.1.c The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.
- 4.4.1.d When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature¹ _____ Date _____
(please use blue ink) Responsible Official or Authorized Representative

Name and Title _____ Title _____
(please print or type) Name

Telephone No. _____ Fax No. _____

¹ This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (I) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
 - (ii) the delegation of authority to such representative is approved in advance by the Director;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of USEPA); or
- d. The designated representative delegated with such authority and approved in advance by the Director.