



Permit / Application Information Sheet
Division of Environmental Protection
West Virginia Office of Air Quality

Company:	Weyerhaeuser		Facility:	Buckhannon	
Region:	8	Plant ID:	097-00029	Application #:	13-1843C
Engineer:	Griffith, Caraline		Category:	Wood Prod	
Physical Address:	41 TJM Drive Buckhannon WV 26201		SIC: [2493] LUMBER & WOOD PRODUCTS, EXCEPT FURNITURE - RECONSTITUTED WOOD PRODUCTS NAICS: [321219] Reconstituted Wood Product Manufacturing		
County:	Upshur		SIC: [2439] LUMBER & WOOD PRODUCTS, EXCEPT FURNITURE - STRUCTURAL WOOD MEMBERS, NEC NAICS: [321214] Truss Manufacturing		
Other Parties:	PLT_MGR - Miller, Lance 304-473-5490 Contact - Hanshaw, Jesse 304-545-8563				

Information Needed for Database and AIRS
 1. Need valid physical West Virginia address with zip

Regulated Pollutants

Summary from this Permit 13-1843C		
Air Programs	Applicable Regulations	
TITLE V		
Fee Program	Fee	Application Type
9M	\$3,500.00	MODIFICATION

Notes from Database
 Permit Note: Three new vertical stack tanks were added and one new sealer line was added.

Activity Dates

APPLICATION RECEIVED	08/12/2015
APPLICATION FEE PAID	08/13/2015
ASSIGNED DATE	08/13/2015
APPLICATION DEEMED COMPLETE	09/24/2015

NON-CONFIDENTIAL

Please note, this information sheet is not a substitute for file research and is limited to data entered into the AIRTRAX database.

Company ID: 097-00029
 Company: Weyerhaeuser
 Printed: 09/24/2015
 Engineer: Griffith, Caraline

AIR QUALITY PERMIT NOTICE

Notice of Intent to Approve

On August 12, 2015, Weyerhaeuser applied to the WV Department of Environmental Protection, Division of Air Quality (DAQ) for a permit to Modify a Wood Products facility located on Industrial Park Road, Buckhannon, Upshur County, WV at latitude 39.0083 and longitude - 80.20307. A preliminary evaluation has determined that all State and Federal air quality requirements will be met by the proposed facility. The DAQ is providing notice to the public of its preliminary determination to issue the permit as R13-1843C

The following increase in potential emissions will be authorized by this permit action: Particulate Matter less than 10 microns, 12.2 tons per year (TPY); Particulate Matter, 12.2 TPY; other pollutants MDI-HAP, 12.2 TPY.

Written comments or requests for a public meeting must be received by the DAQ before 5:00 p.m. on **(Day of Week, Month, Day, Year)**. A public meeting may be held if the Director of the DAQ determines that significant public interest has been expressed, in writing, or when the Director deems it appropriate.

The purpose of the DAQ's permitting process is to make a preliminary determination if the proposed Modification will meet all state and federal air quality requirements. The purpose of the public review process is to accept public comments on air quality issues relevant to this determination. Only written comments received at the address noted below within the specified time frame, or comments presented orally at a scheduled public meeting, will be considered prior to final action on the permit. All such comments will become part of the public record.

Caraline Griffith
WV Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
Telephone: 304/926-0499, ext. 1258
FAX: 304/926-0478

Additional information, including copies of the draft permit, application and all other supporting materials relevant to the permit decision may be obtained by contacting the engineer listed above. The draft permit and engineering evaluation can be downloaded at:

www.dep.wv.gov/daq/Pages/NSRPermitsforReview.aspx

Griffith, Caraline F

From: Miller, Lance <Lance.Miller@weyerhaeuser.com>
Sent: Thursday, September 24, 2015 11:20 AM
To: Griffith, Caraline F
Subject: RE: WV DAQ NSR Permit Application Complete for Weyerhaeuser, Buckhannon Facility

Thanks Caraline.

From: Griffith, Caraline F [<mailto:Caraline.F.Griffith@wv.gov>]
Sent: Thursday, September 24, 2015 8:22 AM
To: Miller, Lance
Cc: McKeone, Beverly D; Jesse Hanshaw
Subject: WV DAQ NSR Permit Application Complete for Weyerhaeuser, Buckhannon Facility

**RE: Application Status: Complete
Weyerhaeuser, Buckhannon Facility
Permit Application R1301843C
Plant ID No. 097-00029**

Mr. Miller,

Your application for a Modification permit for a Wood Product Facility was received by this Division on August 12, 2015 and assigned to the writer for review. Upon review of said application, it has been determined that the application is complete and, therefore, the statutory review period commenced on September 24, 2015.

In the case of this application, the agency believes it will take approximately 90 days to make a final permit determination.

This determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit determination.

Should you have any questions, please contact Caraline Griffith at (304) 926-0499 ext. 1258 or reply to this email.

Caraline Griffith

Dept. of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Engineer Trainee
Caraline.F.Griffith@wv.gov
304-926-0499 x1258

Griffith, Caraline F

From: Griffith, Caraline F
Sent: Tuesday, August 25, 2015 9:45 AM
To: 'Jesse Hanshaw'
Subject: RE: Weyerhaeuser's Buckhannon Application Address Correction

Good Morning Jesse,

I will absolutely make that change! Thank you so much for all your help. I really appreciate it!

Caraline Griffith

Dept. of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Engineer Trainee
Caraline.F.Griffith@wv.gov
304-926-0499 x1258

From: Jesse Hanshaw [<mailto:jhanshaw@slrconsulting.com>]
Sent: Tuesday, August 25, 2015 9:01 AM
To: Griffith, Caraline F
Subject: Weyerhaeuser's Buckhannon Application Address Correction

Good Morning Caraline,

Hope you are having a great day. I just noticed that the address on the application form that was submitted for Weyerhaeuser still has their old, pre 911 address change. Could you please be sure to use the 41 TMJ Drive according to the attached revised application form, as opposed to the 100 TMJ Drive. Please keep in mind there is not physical change to location here. Prior to going to notice I will bring you a new electronic version of the total application for the website that has this correction as well as an others that may be necessary between then and now. I will also be sure to make the corrections we worked on last week with respect to the Emission Unit IDs.

Just let me know if you have any questions as you continue to process this application. I know there are some 40CFR Part 63, MACT sections that can get a bit convoluted within Subpart DDDD.

Thanks,
Jesse

Jesse Hanshaw
Principal Engineer
SLR International Corporation

Cell: 304-545-8563
Office: 681-205-8949

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8 Capitol Street Suite 300, Charleston, WV, 25301, United States

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Griffith, Caraline F

From: Griffith, Caraline F
Sent: Thursday, August 20, 2015 11:36 AM
To: 'Jesse Hanshaw'
Subject: RE: Weyerhaeuser - Buckhannon Facility - Permit Status Update

Hi Jesse,

Thanks so much! My summer has been busy and fun, as well. Also a good thing to keep busy.

I hope you have a great day, too!

Best,

Caraline Griffith

Dept. of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Engineer Trainee
Caraline.F.Griffith@wv.gov
304-926-0499 x1258

From: Jesse Hanshaw [<mailto:jhanshaw@slrconsulting.com>]
Sent: Thursday, August 20, 2015 11:34 AM
To: Griffith, Caraline F
Subject: RE: Weyerhaeuser - Buckhannon Facility - Permit Status Update

Hi Caraline,

It's great to hear from you. So far so good this summer just staying busy, which is a good thing. I hope you are having a good one too!

I apologize for the mix up on the application's unit IDs. Please find attached a new Att. J with the typo corrected. You were correct in assuming the E09 went with 005-09 for the Spray Booth. We shelved this application for about 6 months and prior to that the company did reverse the order in which we originally accounted for the IDs.

Nevertheless, I was a little rusty when I did my final review on this and missed some of those changes. Thanks for getting it straightened out for us. Please let me know if you should need anything else.

Have a great day!
Jesse

Jesse Hanshaw
Principal Engineer

SLR International Corporation

Cell: 304-545-8563

Office: 681-205-8949

Email: jhanshaw@slrconsulting.com

8 Capitol Street Suite 300, Charleston, WV, 25301, United States

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From: Griffith, Caraline F [<mailto:Caraline.F.Griffith@wv.gov>]

Sent: August 20, 2015 10:48 AM

To: Jesse Hanshaw

Subject: Weyerhaeuser - Buckhannon Facility - Permit Status Update

Hi Jesse!

Hope you are doing well! I'm glad to be working on another one of your permits. I have a quick question regarding the ID No.'s on the emission points. Is Vertical Stack E09 supposed to be associated with Emission Unit Vented ID No. 005-007 or 005-009 for the Spray Booth? On the Emission Points Data Summary Sheet it has it listed as being associated with 005-007, however on the Attachment E – Emission Unit Form, it looks like the Spray Booth actually has the ID No. 005-009. Let me know which is which so I can get everything correct for the permit.

Thank you! Talk soon,

Caraline Griffith

Dept. of Environmental Protection

Division of Air Quality

601 57th Street SE

Charleston, WV 25304

Engineer Trainee

Caraline.F.Griffith@wv.gov

304-926-0499 x1258

Griffith, Caraline F

From: Griffith, Caraline F
Sent: Thursday, August 20, 2015 11:08 AM
To: Ray, Richard Eric
Subject: RE: Weyerhaeuser - Buckhannon Facility Inspection

Hi Eric,

Thank you so much! That's perfect! I'm working on an NSR modification.

Thanks,

Caraline

From: Ray, Richard Eric
Sent: Thursday, August 20, 2015 11:06 AM
To: Griffith, Caraline F
Subject: RE: Weyerhaeuser - Buckhannon Facility Inspection

Caraline,

It was a full on-site inspection. I'm waiting on one last bit of info (Microllam edge sealant VOC content) from Weyerhaeuser before I can finish the report. They are supposed to get that to me next week. So, the report should be finished by then. Probably they will be in compliance unless they surprise me with what they send.

Are you working on a Title V permit modification?

Eric

From: Griffith, Caraline F
Sent: Thursday, August 20, 2015 11:00 AM
To: Ray, Richard Eric
Subject: Weyerhaeuser - Buckhannon Facility Inspection

Hello!

I am working on a Modification for the Weyerhaeuser Buckhannon Facility and was looking for the most up-to-date site inspection. It looks like, from AirTrax, you were assigned to do it on May 30 of this year and I was curious if it was a Full On Site, Targeted inspection, or a Title V inspection and what the rating it received was.

Thank you!

Caraline Griffith

Dept. of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Engineer Trainee

Caraline.F.Griffith@wv.gov

304-926-0499 x1258

Griffith, Caraline F

From: Adkins, Sandra K
Sent: Thursday, August 13, 2015 9:53 AM
To: lance.miller@weyerhaeuser.com
Cc: McKeone, Beverly D; Griffith, Caraline F
Subject: WV DAQ Permit Application Status for Weyerhaeuser; Buckhannon

**RE: Application Status
Weyerhaeuser
Buckhannon Facility
Plant ID No. 097-00029
Application No. R13-1843C**

Mr. Miller,

Your application for a modification permit for the Buckhannon facility was received by this Division on August 12, 2015, and was assigned to Caraline Griffith. The following item was not included in the initial application submittal:

Original affidavit for Class I legal advertisement not submitted.

**Please note to use the new phone extension 1250 for future legal ads*

This item is necessary for the assigned permit writer to continue the 30-day completeness review.

Within 30 days, you should receive a letter from Caraline stating the status of the permit application and, if complete, given an estimated time frame for the agency's final action on the permit.

Any determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit decision.

Should you have any questions, please contact the assigned engineer, Caraline Griffith, at 304-926-0499, extension 1258.



west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
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Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.: R13-1843C
Plant ID No.: 097-00029
Applicant: Weyerhaeuser
Facility Name: Buckhannon Facility
Location: Buckhannon, Upshur County, WV
NAICS Code: 321219 & 321214
Application Type: Modification
Received Date: August 12, 2015
Engineer Assigned: Caraline Griffith
Fee Amount: \$3,500.00
Date Received: August 13, 2015
Complete Date: September 24, 2015
Due Date: December 23, 2015
Applicant Ad Date: August 14, 2015
Newspaper: *The Record Delta*
UTM's: Easting: 569 km Northing: 4318.0 km Zone: 17
Description: Installation and operation of new spray sealer line.

DESCRIPTION OF PROCESS

Weyerhaeuser has plans to upgrade their Parallam product line to increase its water resistance. In order to accomplish this value added application a spray booth will be installed to apply a MDI sealer to the outside surface of the beams. After the sealer is applied the product will be allowed to cure within a ventilation tunnel, which is integrally attached to the paint booth and final water quench stages. This tunnel is to allow a sufficient cure time before a water deluge is applied to the product as the final setting stage.

The new product treatment line will utilize a 6,000 gallon MDI bulk storage tank to receive new raw material shipments of the sealer. Additionally, a 350 gallon day tank will be used also as a mix tank for a small amount of colorant that is added. Each of these tanks will be blanketed with dry air from a conditioning system which keeps the pressure on the tanks

at between 10 and 20 psig.

Emissions will be controlled at the sealer spray booth and its attached ventilation tunnel using 90% efficient paint booth cartridge style PM filters. Additionally, the MDI emissions evolved from the tanks are expected to be minimal due to the conservation vent settings and MDI's relatively low vapor pressure of 0.0006 mm Hg at 100F.

SITE INSPECTION

The writer did not inspect the site. On June 12, 2015 Richard E. Ray inspected the facility for a "Full On Site" Targeted inspection. The inspector gave the site a rating of 30. His notes were as follows:

Records of fuel use, resin use and dry veneer production indicated compliance with permit limits. Fuel analysis results and resin MSDS when taken together with the usage records indicated compliance with SO₂ and formaldehyde emission limits. Compliance with the Plywood MACT was indicated in all the semiannual reports received by DAQ and only required that the facility process less than 30% softwood tree species and use no-HAP coatings. No evidence of deviation from either requirement was found during the site visit or record review. No opacity problems, fugitive or otherwise, were found during the site visit and visible emission records, including the COMS based excess emission reports and the quarterly EPA Method 9 checks, indicated nothing unusual, though they did indicate emissions. Records showed that regular pressure drop readings were taken on the bag-houses and that the ESP's were regularly monitored and operated within permitted parameters. Taken together with the fuel use and production records these observations tend to indicate compliance with particulate emission limits. On site observations of the wood boiler's firebox temperature and of O₂ content in the wood boiler's flue gas together with records of the O₂ content tended to show compliance with NO_x, CO, and VOC emission limits. Compliance with VOC limits was further supported by observed and recorded dryer temperatures and records showing that edge seal VOC content, quantity of sealant applied, and application pressures in the spray booth were within permit limits. Although there were some deviations discovered, including exceedances above the O₂ limit on the boiler's flue gas and some recorded excess opacity in boiler emissions, concern over these was not that great as they tended to be associated with unusual but permissible operations such as start up, shut down, and idling of the boiler.

Directions to the facility:

From Charleston, take Interstate 79 North to the Weston/Buckhannon Exit (Exit 99). Proceed on Route US 33 East towards Buckhannon, approximately 14 miles, after passing by Route 20 (Phillipi/Buckhannon) Exit. Take the second exit on the left onto Industrial Park Road (Route 15/33). Continue on Industrial Park Road for approximately 1 mile until coming to STOP sign. The Plant is straight ahead.

Fact Sheet R13-1843C
Weyerhaeuser
Buckhannon Facility

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

The following emission estimates were given by Weyerhaeuser and checked by the permit engineer. These calculations were based on Engineering Estimates (EE) given by the company for the three vertical stacks (E09, E08, and E07).

Table 1: Emission Point Description

Emission Point ID	Emission Point Type	Emission Unit Vented Through This Point		Air Pollution Control Device		Maximum Throughput of Tanks	
		ID No.	Source	ID No.	Device Type		
E09	Vertical Stack	42132	Spray-Booth	3C	Filter	9.12 gal/hr	79,842 gal/year
E08	Vertical Stack	42131	MDI Day/Mix Tank	NA	NA	350 gallons	
E07	Vertical Stack	42130	MDI Bulk Tank	NA	NA	6000 gallons	

Table 2: Emission Estimates for Maximum Controlled Emissions

Source	PM10		MDI-HAP	
	lb/hr	TPY	lb/hr	TPY
E09	2.79	12.2	2.79	12.2
E08	0	0	0	0
E07	0	0	0	0

REGULATORY APPLICABILITY

45CSR7: Prevention of PM from Manufacturing Sources

The spray booth was evaluated as a manufacturing source operation due to its potential to generate PM. The source is considered a "type of source operations" where the application of the sealer constitutes a physical change to the product being manufactured. Therefore the source is subject to the 20% opacity limitation and a PM limit based on process weight rate. The weight of the wood products being sealed is 19,200 lb/hr based on an average density of 42 lb/ft³. Therefore, the emission limit from

45CSR7 is approximately 16 lb/hr. Assuming a 70% transfer efficiency and a 90% average PM control efficiency the spray booth source is not expected to exceed 2.79 lb/hr PM and will be in compliance with this rule.

45CSR13: Permits for Construction, Modification, Relocation, and Operation of Stationary Sources of Air Pollutants

The addition of a sealer spray line, curing tunnel, and associated sealer storage tanks (E08 and E07) constitutes a modification under 45CSR13 as a result of exhibiting a potential of 27.9 lb/hr of PM from the uncontrolled spray booth based on 70% transfer efficiency. Under this permit application 90% control of this PM stream is proposed, but actual efficiency is expected to be even higher due to the tendency of this material to polymerize and form large diameter PM. Emissions from all other ancillary activities related to the curing tunnel and storage vessels will be insignificant based on the low vapor pressure classified as a hazardous air pollutant (HAP) under the methylene diphenyl diisocyanate (MDI) compound.

Weyerhaeuser published a legal advertisement in *The Record Delta* on August 14, 2015 and has paid all applicable fees on August 13, 2015.

45CSR22 AIR QUALITY MANAGEMENT FEE PROGRAM

The applicant has paid the \$1,000 application fee and the \$2,500 NESHAP fee as required by section 3.4.b of this rule because they are subject to NESHAP requirements as described in this regulatory review section.

Additionally, the source is required to maintain their certificate to operate.

45CSR30: Operating Permit Requirements

As a result of the additional equipment to be installed at Weyerhaeuser's Buckhannon Trus Joist Facility as described within the 45CSR13 sections above the process changes will be classified as a significant modification to the Title V Permit.

40CFR63, Subpart DDDD: National Emission Standards for Hazardous Air Pollutants from Plywood and Composite Wood Products Facilities

The facility is a major source of HAPs and is currently subject to the Plywood and Composite Wood Products (PCWP) MACT. The proposed sealer spray line was evaluated with respect to the requirements defined within this subpart. The spray application is defined within the definition of the "Miscellaneous Coating Operations" as a moisture sealant. As a result, the work practice standards found in Table 3 of Subpart DDDD, specific to "Group 1 Miscellaneous Coating Operations," do not apply. The moisture sealant proposed by this modification and referred to as W18 is emitted as PM and also classified as an MDI, HAP. Due to the large molecular weight of MDI and its willingness to polymerize when reacted with water, the emissions are expected to be

100% Particulate Matter. Therefore, the exhaust lends itself to a high level of control by utilizing particulate filters as designed for painting booth applications.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

MDI (Methylene Diphenyl Diisocyanate)

The commercial form of 4,4'-methylenediphenyl diisocyanate (MDI) is used to produce polyurethane foams. Acute (short-term) inhalation of high concentrations of MDI may cause sensitization and asthma in humans. Acute dermal contact with MDI has induced dermatitis and eczema in workers. MDI has been observed to irritate the skin and eyes of rabbits. Chronic (long-term) inhalation exposure to MDI has been shown to cause asthma, dyspnea, and other respiratory impairments in workers. Respiratory effects have also been observed in animals. No adequate information is available on the reproductive, developmental, or carcinogenic effects of MDI in humans. EPA has classified MDI as a Group D, not classifiable as to human carcinogenicity.

MONITORING OF OPERATIONS

Weyerhaeuser must follow all applicable monitoring, record keeping, reporting, and test requirements. The following monitoring requirements were taken from the previous permit, R13-1843B, but still apply for this modification and the rest of the facility.

The following information shall be recorded in logs and maintained at the permitted facility for a period of five (5) years, and made available to the Director of the Office of Air Quality, or his/her designated representative, upon request:

- a. amount of dried veneer in pounds per hour produced in the dryers on an hourly basis back calculated from calendar monthly dryer throughput,
- b. amount of resin in pounds per hour charged to Microllam™ LVL presses on an hourly basis back calculated from calendar monthly production,
- c. amount of resin in tons per month charged to Microllam™ LVL presses on a monthly basis back calculated from calendar monthly production,
- d. amount of resin in pounds per hour charged to the Parallam® PSL press on an hourly basis back calculated from calendar monthly production,
- e. amount of resin in tons per month charged to the Parallam® PSL press on a monthly basis back calculated from calendar monthly production,

Compliance with the particulate matter emission limitations under Provision A.9. and 40CFR60.43b(a) shall be demonstrated in accordance with 40CFR60.8, 40CFR60.46b and WAPCC TP-2 "Compliance Test Procedures for Regulation II".

Fact Sheet R13-1843C
Weyerhaeuser
Buckhannon Facility

Compliance with the particulate matter emission limitation under Provision A.12. Shall be demonstrated in accordance with WVAPCC TP-2 "Compliance Test Procedures for Regulation II".

Compliance with the particulate matter emission limitations under Provision A.11. shall be demonstrated in accordance with WVAPCC TP-4 "Compliance Test Procedures for Regulation VII".

CHANGES TO PERMIT R13-1843B

Due to the formatting that was required with R13-1843B, the current permit evaluation and permit had to be reformatted to fit the new style. The main change is that three (3) vertical stack tanks were added and a sealer line was installed.

RECOMMENDATION TO DIRECTOR

The information provided in the permit application indicates the proposed modification of the facility will meet all the requirements of the applicable rules and regulations when operated in accordance with the permit application. Therefore, the writer recommends granting Weyerhaeuser a Rule 13 modification permit for their wood products manufacturing facility located in Buckhannon, WV.

Caraline Griffith
Permit Engineer

Date

Fact Sheet R13-1843C
Weyerhaeuser
Buckhannon Facility

Permit to Modify



R13-1843C

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:
Weyerhaeuser
Buckhannon Facility
097-00029

William F. Durham
Director

Issued: DRAFT

This permit supercedes and replaces R13-1843B.

Facility Location: Buckhannon, Upshur County, West Virginia
Mailing Address: 100 TJM Drive
Buckhannon, WV 26201
Facility Description: Engineered Wood Products Facility
NAICS Codes: 321219
UTM Coordinates: 568.0 Easting: km 4316.5 Northing: km Zone: 17
Permit Type: Modification
Description of Change: Installation of new spray sealer line.

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.

Table of Contents

1.0. Emission Units	3
2.0. General Conditions	5
2.1. Definitions	5
2.2. Acronyms	5
2.3. Authority	6
2.4. Term and Renewal	6
2.5. Duty to Comply	6
2.6. Duty to Provide Information	6
2.7. Duty to Supplement and Correct Information	7
2.8. Administrative Permit Update	7
2.9. Permit Modification	7
2.10. Major Permit Modification	7
2.11. Inspection and Entry	7
2.12. Emergency	7
2.13. Need to Halt or Reduce Activity Not a Defense	8
2.14. Suspension of Activities	8
2.15. Property Rights	8
2.16. Severability	9
2.17. Transferability	9
2.18. Notification Requirements	9
2.19. Credible Evidence	9
3.0. Facility-Wide Requirements	10
3.1. Limitations and Standards	10
3.2. Monitoring Requirements	10
3.3. Testing Requirements	11
3.4. Recordkeeping Requirements	12
3.5. Reporting Requirements	12
3.6. Operating Fee.....	13
4.0. Source-Specific Requirements	14
4.1. Limitations and Standards	14
4.2. Testing Requirements	16
4.3. Monitoring and Recordkeeping Requirements	17
4.4. Reporting Requirements	18
CERTIFICATION OF DATA ACCURACY	19

1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Instaled	Design Capacity	Control Device
001-01	WoodFurn	Wood Fired Furnace	1995	116 MMBtu/hr	ESP, MClone
001-02	StandByFurn1	Standby Furnace	1995	40 MMBtu/hr	None
003-01	Veneer Dry	Two (2) Veneer Dryers	1995	42,000 lb/hr	None
004-01	Mlam Press	Two (2) Microllam Press	1995	456 ft ³ /hr	None
004-02	Mlam Reman1	Microllam Reman Equipment #1	1995	NA	BGHS4
004-03	Mlam Reman2	Microllam Reman Equipment #2	1995	NA	BGHS3
004-04	Mlam Tanks	Microllam Resin Tanks	1995	10,000 Gallons Each	None
004-05	Dry Silo	Dry Fuel Silo	1995	26,932 ft ³	None
004-06	Mlam Booth	Microllam Spray Booth	2003	NA	BGHS5
004-07	Chip Bin	Storage of Green, Wet Wood Chips	1995	13,600 ft ³	None
004-08	Fuel House	Storage of Wood Fuel	1995	96,000 ft ³	None
005-01	Plam Press	Parallam Press	1995	456 ft ³ /hr	None
005-03	Plam Layup	Parallam Standing Operation	1995	NA	BGHS1
005-04	Plam Reman1	Parallam Reman Equipment #1	1995	NA	BGHS2A
005-05	Plam Reman2	Parallam Reman Equipment #2	1995	NA	BGHS2B

005-06	Plam Tanks	Parallam Resin Tanks	1995	15,000 Gallons Each	None
005-07	E07	Sealer Bulk Tank	2016	6,000 Gallons	None
005-08	E08	Sealer Day/Mix Tank	2016	350 Gallons	None
005-09	E09	Parallam Sealer Spray Booth	2016	9.12 gal/hr	Booth Filter (3C)

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 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 R13-1843C 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 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 45CSR11.
[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
Charleston, WV 25304-2345

If to the US EPA:
Associate Director
Office of Air Enforcement and Compliance
Assistance
(3AP20)
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 45CSR22 – Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the certificate 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 The permittee shall process only Yellow Poplar, except that alternate wood species of hardwood and soft hardwood with estimated emissions for VOCs equal to or less than that assumed in developing the emission limits in the permit for Yellow Poplar may also be processed in compliance with the conditions of this permit. Estimated emissions for such alternate wood species shall be determined by reference to the latest edition of AP-42 factors at the time of processing, by reference to another authoritative emission factors source approved by the Director, or, at the permittee's option, by testing for a period not to exceed a two-month duration during which emission data would be obtained to determine continuing compliance with the conditions of this permit. For alternative softwood species whose VOC emissions estimates may be greater than the VOC emission estimates assumed for Yellow Poplar in developing the emission limits in this permit, the permittee shall conduct testing as just described pursuant to a protocol submitted by the permittee and approved by the Director to obtain emission data on VOCs to determine whether such species may be processed in compliance with the conditions of this permit or whether a permit modification is necessary to allow such processing.
- 4.1.2 No more than 8,840 tons of premixed liquid phenol-formaldehyde resin shall be charged to the Microllam™ LVL presses on an annual basis.
- 4.1.3 The use of premixed liquid phenol-formaldehyde resin the the Microllam™ LVL and Parallam® PSL presses shall be so controlled that the emissions of formaldehyde from each press shall not exceed 0.69 pounds per hour.
- 4.1.4 No more than 13,000 tons of liquid phenol-formaldehyde resin shall be charged to the Parallam® PSL press on an annual basis.
- 4.1.5 Nor more than a combined 42,000 pounds per hour of dry veneer shall be produced in both of the wood veneer screen dryers.
- 4.1.6 The average maximum temperature setpoint for each of the two (2) wood veneer screen dryers shall not exceed 500° F.
- 4.1.7 The wood-waste fuel feed rate to the furnace shall not exceed 25,550 pounds per hour or 111,930 tons per year.
- 4.1.8 The permittee shall not burn any washwater waste stream containing phenol-formaldehyde resin the furnace. If the washwater waste stream is determined to be non-hazardous through a hazardous waste review then it may be burned in the furnace provided that the emission limits under Provision A.9. are not exceeded and formaldehyde emissions do not result from such burning.
- 4.1.9 Air pollutant emissions from the emission point S1 serving the wood-waste fired furnace, Equipment ID V1, shall not exceed any of the following limitations:

Pollutant	Emission Rate (lb/hr)
Carbon Monoxide (CO)	41.0
Oxides of Nitrogen (NO _x)	38.5
Particulate Matter (PM)	3.0

Pollutant	Emission Rate (lb/hr)
Sulfur Dioxide (SO ₂)	1.5
Volatile Organic Compounds (VOC)	4.5

4.1.10 Air pollutant emissions from the emission points S2-S13 serving the two (2) wood veneer screen dryers, Equipment ID P1, shall not exceed any of the following limitations:

Pollutant	Emission Rate (lb/hr)
Particulate Matter (PM) All Stacks	31.2
Particulate Matter (PM) Per Cooling Stack	7.40
Particulate Matter (PM) Per Drying Stack	1.0
Volatile Organic Compounds (VOC)	18.0

4.1.11 The following maximum emissions from the fabric filter shall not be exceeded:

Source ID	Pollutant	Emission Point ID	Emission Rate (lb/hr)
C11	Particulate Matter	S23	2.40
C12	Particulate Matter	S24	1.91
C13	Particulate Matter	S25	2.18
C14	Particulate Matter	S26	1.14
C15	Particulate Matter	S17	1.71
C16	Particulate Matter	S28	0.19

4.1.12 Air pollutant emissions from emission point S22 serving the Back-up Furnace shall not exceed the following limitations:

Pollutant	Emission Rate (lb/hr)
Carbon Monoxide (CO)	1.39
Oxides of Nitrogen (NO _x)	9.0
Particulate Matter (PM)	1.0
Sulfur Dioxide (SO ₂)	0.5
Volatile Organic Compounds (VOC)	1.86

4.1.13 Air pollutant emissions from emission points E07, E08, and E09 serving the MDI Bulk Tank, the MDI Day/Mix Tank, and the sealant Spray Booth, respectively, shall not exceed the following limitations:

Source ID	Pollutant	Emission Point ID	Emission Rate (lb/hr)
005-09	Particulate Matter/MDI	E09	2.79
005-08	Particulate Matter/MDI	E08	0.00
005-07	Particulate Matter/MDI	E07	0.00

4.1.14 The permittee shall burn no more than one (1) ton per month of non-hazardous waste oils, oily rags and adsorbent material saturated with such oils. Said burning shall not result in emissions in excess of the limitations set forth in Provision A.9. of this permit. The permittee shall perform a hazardous waste review on an annual basis to insure that routine procedures consistently produce non-hazardous waste materials. The results of these hazardous waste reviews shall be forwarded to the Director of the Office of Air Quality no later than thirty (30) days after determination has been made. Said results shall be certified to be accurate and true by a Responsible Official.

4.1.15 Fugitive dust control measures as proposed in Permit Application R13-1703 and its supplements, shall be installed, operated and maintained in such a manner as to minimize fugitive dust generation and atmospheric entrainment. Such measures shall include but not be limited to the following:

- a. Ash shall be thoroughly wetted via a wet transfer conveyor prior to handling.
- b. Wetted ash shall be loaded into sealed metal containers prior to transport to an off-site location.
- c. The bark hog hammermill, ID# OP5, shall be fully enclosed.
- d. The chipper, ID#OP7, shall be fully enclosed.
- e. The area surrounding the hammermill and chipper shall be cleaned of wood dust as often as necessary to prevent the wood particles from drying and becoming airborne.
- f. Facility roadways, associate (employee) and visitor parking areas, and product loading areas shall be paved with asphalt or concrete, or shall be graveled. Subject roadways and areas shall be watered using a pressurized water spray on an as needed basis.
- g. The dry fuel silo, ID# OP10, shall be covered.
- h. Material transfer from the dry fuel silo into trucks shall be conducted in a partially enclosed stall.

4.2. Testing Requirements

4.2.1. In order to determine compliance with the opacity requirements of section 4.1.11 of this permit, the permittee shall conduct visible emission checks and / or opacity monitoring and recordkeeping for the flare (5S).

- a. The visible emission check shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40CFR

Part 60, Appendix A, Method 22 or from the lecture portion of the 40CFR Part 60, Appendix A, Method 9 certification course.

- b. Visible emission checks shall be conducted at least once per calendar month with a maximum of forty-five (45) days between consecutive readings. These checks shall be performed at each source (stack, transfer point, fugitive emission source, etc.) for a sufficient time interval, but no less than one (1) minute, to determine if any visible emissions are present. Each observation must be recorded as either visible emissions observed or no visible emissions observed. Visible emission checks shall be performed during periods of normal facility operation and appropriate weather conditions.
- c. If visible emissions are present at a source(s) the permittee shall take corrective action as soon as practicable, but within seventy-two (72) hours of the emission check. Once corrective action has been taken another observation shall be made to confirm that no visible emissions are present.

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. For the purpose of determining compliance with 4.1.4 of this permit, the permittee shall maintain records of hours of operation of the emergency generator (2S).
- 4.3.5. For the purpose of determining compliance with 4.1.3 of this permit, the permittee shall maintain records of the quantity of diesel fuel burned in the emergency generator (2S).
- 4.3.6. For the purpose of determining compliance with 4.1.7 of this permit, the permittee shall maintain records of the maximum sulfur content of the diesel fuel on a per-shipment basis for fuel oil.

4.4. Reporting Requirements

- 4.4.1. The permittee shall comply with all applicable reporting requirements of 40CFR§63.2280 through 40CFR§63.2283.

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.