

# Fact Sheet



## For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-02300023-2011**  
Application Received: **September 14, 2010**  
Plant Identification Number: **023-00023**  
Permittee: **Allegheny Wood Products International, Inc.**  
Facility Name: **Plant #4**  
Mailing Address: **P.O. Box 130, Petersburg, WV 26847**

*Revised: N/A*

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Physical Location:	Petersburg, Grant County, West Virginia
UTM Coordinates:	660.476 km Easting • 4316.993 km Northing • Zone 17
Directions:	From the intersection of US Route 220 and State Route 28 in Petersburg, follow US Route 220 South to Airport Road. Turn right onto Airport Road and follow for approximately one mile to the Grant County Industrial Park. Turn right into the industrial park and Plant #4 is on the right

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### Facility Description

Allegheny Wood Products International, Inc. Plant #4 is a lumber/wood products facility covered by Standard Industrial Classification (SIC) 2421. The plant has the potential to operate twenty-four (24) hours per day, seven (7) days per week and fifty-two (52) weeks per year. The facility operates a dry kiln facility, a sawing and planing facility, and processes scrap wood to be used as fuel for the two boilers. There are thirteen (13) drying kilns at the facility that operate with steam heat generated from the boilers and which have no emissions associated with their operation.

**Emissions Summary**

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2009 Actual Emissions</b>
Carbon Monoxide (CO)	171.06	71.59
Nitrogen Oxides (NO <sub>x</sub> )	13.17	5.20
Particulate Matter (PM <sub>10</sub> )	21.84	7.79
Total Particulate Matter (TSP)	80.92	7.79
Sulfur Dioxide (SO <sub>2</sub> )	2.10	0.1
Volatile Organic Compounds (VOC)	8.88	2.04

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2009 Actual Emissions</b>
Total Miscellaneous HAPs	0.83	0.42

*Some of the above HAPs may be counted as PM or VOCs.*

**Title V Program Applicability Basis**

This facility has the potential to emit 171 tons per year of CO. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Allegheny Wood Products International, Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

**Legal and Factual Basis for Permit Conditions**

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:

- 45CSR2 To Prevent And Control Particulate Air Pollution From Combustion Of Fuel In Indirect Heat Exchangers
- 45CSR6 Open burning prohibited.
- 45CSR7 To Prevent And Control Particulate Matter Air Pollution From Manufacturing Processes And Associated Operations
- 45CSR10 Control of Sulfur Dioxide Emissions from Indirect Heat Exchangers
- 45CSR11 Prevention Of Air Pollution Emergency Episodes
- 45CSR13 Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation

45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40CFR Part 60
45CSR30	Operating permit requirement.
45CSR34	Emission Standards For Hazardous Air Pollutants
40 C.F.R. Part 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
40 C.F.R. Part 61, Subpart M	National Emission Standard For Asbestos
40 C.F.R. Part 63, Subpart JJJJJ	National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers
40 C.F.R. Part 64	Compliance Assurance Monitoring
40 C.F.R. Part 82, Subpart F	Ozone depleting substances
WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.

State Only:

45CSR4	To Prevent And Control The Discharge Of Air Pollutants Into The Open Air Which Causes Or Contributes To An Objectionable Odor Or Odors
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Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

**Active Permits/Consent Orders**

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-1869A	July 7, 1999	Supersedes and replaces the original permit R13-1869 issued November 16, 1995

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

## Determinations and Justifications

This is a renewal of the Title V permit which was issued on March 22, 2006 and modified on August 17, 2010. Changes to the most recent version of the Title V Permit consist of the following:

### 1) Emission Units Table Section 1.1

- The two planers 005 and 006 have been separated in the table. The combined design capacity was previously shown to be 4500 linear ft/hr. The origin of this number is unknown. The design capacity reported in this renewal application shows Planer 005 at 625 linear ft/hr and Planer 006 at 2500 linear ft/hr. These design capacities are consistent with the reported capacities in Permit R13-1869 application. Therefore the emission units table has been revised.

### 2) Title V Boilerplate changes

- **Condition 1.2.** - This condition has been added to show the latest version of any Rule 13, 14, and 19 permits with the Issuance date of such permit.
- **Condition 2.1.4.** – This condition has been added and states: *Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a “rolling yearly total” shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.*
- **Condition 3.1.1. and 3.1.2.** – These conditions were revised because the language in 45CSR§§6-3.1. & 3.2. was revised.
- **Condition 3.1.3.** The citation of authority was changed because 45CSR15 was repealed and 40 CFR 61 is now incorporated into 45CSR34. Also expanded 40 C.F.R. 61 citation to 40 C.F.R. §61.145(b). Slight language revision.
- **Condition 3.3.1.** – Subsection “d” was added to this condition. Also section 14 of WV Code §§22-5-4 (a) was added in the citation of authority
- **Condition 3.5.3. and 3.5.5.** These conditions were revised to require electronic submittal of the annual certification to USEPA. The certification shall now only be submitted to the USEPA by e-mail.

### 3) Condition 3.7.

- 40 CFR63 was removed as a non-applicable permit shield item. The wood-fired boilers are now subject to the new area source boiler GACT (see Item #4 below).

### 4) 40 CFR 63 Subpart JJJJJJ -National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers

- This rule is applicable to both wood-fired boilers. The boilers are defined as existing biomass boilers and therefore are subject to biennial tune-up requirements specified in 40 CFR §63.11223. The main boiler has a design capacity greater than 10 million Btu per hour and therefore it is also required to have a one-time energy assessment performed. The associated notifications, reporting and recordkeeping are also applicable. Conditions 4.1.13. – 4.1.15., 4.4.3., 4.4.4., and 4.5.4. – 4.5.7. have been added to the permit.

### 5) 40 CFR Part 64 – Compliance Assurance Monitoring (CAM)

- The CAM rule was not applied to boiler 002 or the woodworking equipment for particulate matter emissions (PM) during the last renewal. The potential to emit (PTE) PM was considered after the control devices as opposed to before the control devices and therefore it was determined that the

CAM rule did not apply. However, the boiler and the woodworking equipment potential to emit PM without the control devices do in fact trigger the major source threshold limit before controls. Therefore CAM is applicable to the boiler and the woodworking equipment. The permittee submitted a CAM plan in this renewal application for wood-fired Boiler 002 and the woodworking equipment (Rip Saw 004, Planers 005 & 006 and Shredder 015) to assure compliance with the Permit R13-1869A PM mass emission limitations through emission point *E-012* for the Boiler 002 and the combined emission point *E-013* for the woodworking equipment. The wood-fired Boiler 002 and the woodworking equipment are CAM pollutant-specific emission units (PSEUs) for PM. The PM emissions from the boiler are controlled by two multiclones in series (i.e., the outlet of the first is the inlet to the second). The PM emissions from the woodworking equipment are controlled by a baghouse. Conditions 4.2.1., 4.2.2., 4.2.3., 4.3.2., 4.4.5., 4.5.8., 5.2.1., 5.2.2., 5.2.3., 5.2.5., 5.4.2. and 5.5.1. have been either revised or added to the permit.

Monitoring per the CAM Plans for each of the PSEUs will be as follows:

		PSEU Main Boiler 002		PSEU 004, 005, 006 & 015
		Indicator No. 1*	Indicator No. 2	Indicator No. 1
<b>I.</b>	<b>Indicator</b>	Method 5 Stack Test	Visible Emissions	Visible Emissions
	<b>Monitoring Approach</b>		Visible emissions from the multiclone exhaust will be monitored daily using EPA Method 22-like procedures	Visible emissions from the baghouse exhaust will be monitored daily using EPA Method 22-like procedures
<b>II</b>	<b>Indicator Range</b>	3.41 lb/hr	No visible emissions. An excursion is defined as any visible emissions during the daily observations.	No visible emissions. An excursion is defined as any visible emissions during the daily observations.
	<b>A. QIP threshold</b>	Not provided at this time.**	Not provided at this time.**	If five (5) observations indicate excursions during a 6-month reporting period, the permittee will develop and implement a QIP.
<b>III</b>	<b>Performance Criteria</b>	Approved Stack Test Protocol.	Measurements are made at the emission point and are indicative of good operation and maintenance of the multiclone.	Measurements are made at the emission point and are indicative of good operation and maintenance of the baghouse.
	<b>A. Data Representativeness</b>			
	<b>B. Verification of Operational Status</b>	NA	There are no <i>new or modified monitoring equipment</i> ; therefore, verification of operational status pursuant to §64.3(b)(2) is not applicable.	There are no <i>new or modified monitoring equipment</i> ; therefore, verification of operational status pursuant to §64.3(b)(2) is not applicable.
	<b>C. QA/QC Practices and Criteria</b>	Method 5 QA/QC procedures	The observer will be educated on the general procedures (Method 22-like) for determining the presence of visible emissions.	The observer will be educated on the general procedures (Method 22-like) for determining the presence of visible emissions.

		PSEU Main Boiler 002		PSEU 004, 005, 006 & 015
		Indicator No. 1*	Indicator No. 2	Indicator No. 1
	<b>D. Monitoring frequency</b>	Once every 5 years ± 12 months	The monitoring frequency is one time per day during daylight and normal operations.	The monitoring frequency is one time per day during daylight and normal operations.
	<b>E. Data Collection Procedure</b>	Per Method 5	The data is collected per Method 22 procedures.	The data is collected per Method 22 procedures.
	<b>F. Averaging Period</b>	6-hour average	None	None

\* Indicator No. 2 for Boiler 002 is the primary CAM Indicator. Indicator No.1 is a support/verification for Indicator No. 2.

\*\* A QIP threshold is not required to be part of the CAM plan. Since it was not included in the CAM plan for these indicators, it is not included here.

- The CAM rule is not applicable to Boiler 002 for Carbon monoxide (CO), since there is no add-on control device utilized to meet its emission limitation.

The woodworking equipment does not emit CO.

- The CAM rule is not applicable to the Boiler 002 for Oxides of Nitrogen (NO<sub>x</sub>), Sulfur Dioxide (SO<sub>2</sub>), Volatile Organic Compounds (VOCs), or Hazardous Air Pollutants (HAPs) since these pollutants do not trigger the pre-control major source threshold limits. Furthermore, there are no add-on control devices for these pollutants.

The woodworking equipment does not emit these pollutants

- The Wood-Fired Boiler 001 does not have emission limits for any regulated air pollutant (as defined in 40 CFR §64.1) and therefore CAM is not applicable to this boiler.

### Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

45CSR§§2-4,5,6,8 and 9 Boiler #1 is under 10 mmBTU/hr and exempt from these sections per 45CSR§2-11. However, failure to attain acceptable air quality in parts of some urban areas may require mandatory control at a later date.

45CSR§§2-8.1.a. and 8.2. Boiler #1 and boiler #2 each have a design heat input less than 100 mmBtu/hr; therefore the boilers are exempt per 45CSR§2-8.4.c.

45CSR10-3, 6, 7, and 8. Boiler #1 is under 10 mmBTU/hr and exempt from these sections per 45CSR§10-10.1. However, failure to attain acceptable air quality in parts of some urban areas may require mandatory control at a later date.

45CSR§10-8. Both boilers combust wood alone and are exempt from this section per 45CSR§10-10.3.

- 45 CSR§7-3.7. The only storage structure potentially subject to this section of 45CSR7 is the storage bin which holds the wood waste fuel for the boilers. Therefore the bin is considered to be part of the fuel burning unit and is subject to the requirements of 45CSR2 and exempt from 45CSR7 requirements per 45CSR§7-10.
- 40 C.F.R. 60 Subpart Db The standby boiler #1 is exempt because it is less than 100 MMBTU/hr. Also, the “commenced construction” date for this boiler is prior to June 19, 1984.
- 40 C.F.R. 60, Subpart Dc\* The main boiler #2 is not subject to the SO<sub>2</sub> and PM standards because it is under 30mmBtu/hr heat input. It is, however, subject to the fuel recording provision.  
*\*Except §60.40c, §60.41c and §60.48c.*

### **Request for Variances or Alternatives**

None.

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: July 12, 2011  
Ending Date: August 11, 2011

All written comments should be addressed to the following individual and office:

Frederick Tipane  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Point of Contact**

Frederick Tipane  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1215 • Fax: 304/926-0478

### **Response to Comments (Statement of Basis)**

Not applicable.