

Emissions Summary

This modification will result in the following changes in potential emissions:

Pollutant	Change in Emissions (TPY)
NO _x	+19.01
CO	-2.55
VOC	+59.19
PM ₁₀	+3.44
HAP	+10.08
SO ₂	+0.89

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 262.71 TPY NO_x, 226.45 TPY CO, 181.99 TPY VOC, and 54.6 TPY Total HAP. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Weyerhaeuser Sutton 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR7	Particulate matter and opacity limits for manufacturing sources.
	45CSR10	Sulfur dioxide limits.
	45CSR13	Preconstruction permits for minor sources.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants Pursuant to 40 C.F.R. Part 63.
	40 C.F.R. Part 63, Subpart DDDD	Plywood and Composite Wood Products MACT
State Only:	None.	

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the 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>)
R13-1761I	August 5, 2016	

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," which may be downloaded from DAQ's website.

Determinations and Justifications

The following changes were made to the Title V Permit.

Section 1.0

- The following Emission Units had the Emission Point ID 23 and Biofilter 4800-00-10 added: 3816-00-11, 3800-00-10, 3916-00-11, 3900-00-10, 3130-00-11, 3230-00-11, 3330-00-11, 3430-00-11, and 4700-00-10.
- Removed Emission Unit 8109-00-10 Wax/Resin Tank Heater.

Section 4.0

- Updated the following conditions to incorporate changes made in R13-1761I: 4.1.2, 4.1.3, 4.1.4, 4.1.6, 4.1.9, 4.1.27, 4.1.28, 4.2.1, 4.2.2, 4.2.3, 4.2.5 (previously 4.2.4), 4.3.1, 4.3.2, 4.4.7 and 4.4.16 .
- Removed/Reserved condition 4.1.10. The Wax/Resin Tank Heater that this condition applies to was removed.
- Updated the citations for conditions 4.1.29, 4.1.31, and 4.2.5 to reflect changes in the numbering of conditions in R13-1761I.
- Added Conditions 4.1.32 and 4.1.33. These are 40 C.F.R. 63 Subpart DDDD conditions for the new Biofilter.
- Added a new Condition 4.2.4 that is used to demonstrate compliance with the new 94 MSF/hr OSB production rate of Condition 4.1.9.4. Since this condition was inserted as 4.2.4 the remaining conditions in section 4.2 were renumbered.
- Removed/Reserved conditions 4.4.3, 4.4.4, and 4.4.5 since they were removed from R13-1761I. Also removed/reserved condition 4.4.15 since the Wax/Resin Tank Heater (Emission Unit 8109-00-10) it pertained to was removed.
- Added Emission Point ID 23 to the list of subject equipment in conditions 4.1.15, 4.1.16, 4.1.19, 4.1.25, and 4.2.7 (previously 4.2.6).

Non-Applicability Determinations

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

40 C.F.R. 64 – Compliance Assurance Monitoring. The biofilter's operations are included as an affected source under the PWCP MACT, 40 C.F.R. 63 Subpart DDDD which qualifies them for an exemption under the CAM applicability Section of 40 C.F.R. §64.2(b)(1)(i).

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: Tuesday, August 16, 2016
Ending Date: Thursday, September 15, 2016

Point of Contact

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

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1243 • Fax: 304/926-0478
Robert.A.Mullins@wv.gov

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.

Response to Comments (Statement of Basis)

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.