



heated ovens associated with the priming operations. The fiber dryer is heated by both steam and natural gas (direct-fired).

The purpose of this Significant Modification is to facilitate construction of a control device controlling HAP emissions to fulfill the requirements of 40 CFR 63 Subpart DDDD.

**Emissions Summary**

<b>Change in Plant-wide Emissions [Tons per Year]</b>	
<b>Regulated Pollutants</b>	<b>Change in Potential Emissions</b>
Particulate Matter (PM <sub>10</sub> )	-8.57
Total Particulate Matter (TSP)	-8.57
Volatile Organic Compounds (VOC)	-90.68
<i>PM<sub>10</sub> is a component of TSP.</i>	
<b>Hazardous Air Pollutants</b>	<b>Change in Potential Emissions</b>
Formaldehyde	-1.67
Methanol	-22.99
Total HAP	-24.39

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

**Title V Program Applicability Basis**

With the proposed changes associated with this modification, this facility maintains the potential to emit 27.22 TPY of Total HAPs and 173.3 TPY of NOx. Due to this facility's potential to emit over 100 tons per year of criteria pollutant and over 25 tons per year of aggregate HAPs, JELD-WEN 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	To Prevent And Control Particulate Matter Air Pollution From Manufacturing Processes And Associated Operations
	45CSR13	NSR Permits
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for HAPs
	40 C.F.R. Part 63, Subpart DDDD	National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products

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> )
R13-21920	1/3/2013	

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

#### Emission Units Table Changes

The Press Vents (E11a,b), Dryer (E7, E8, and E9) and Rotary Valve (E16) all now vent to a common control device, the Biofilter (BF), and a common emission point (E18). Emission points E7, E8, E9, E11, and E16 no longer exist.

#### Permit Language Changes

The following permit language changes, which were approved under R13-21920, were made as a result of the Press Vents, Dryer, and Rotary Valve now venting to a common control device, the Biofilter (BF), and associated emission point (E18):

- Condition 5.1.8, which addresses emissions of Hazardous Air Pollutants (HAPs), was revised to specify E18 instead of E7, E8, and E9. Additionally, the emission limits of this condition were revised resulting in an overall reduction in HAP emissions.
- Condition 5.1.9 addresses styrene, formaldehyde, and methanol emissions. This condition was revised to specify E18 instead of E7, E8, E9, E11, and E16. Additionally, the emission limits for formaldehyde and methanol were reduced.
- Condition 5.1.11 previously contained HAP emission limits for the Press Vents (PV, E11a, and E11b). This old language was removed and replaced with language specifying that emissions from the Fiber Dryer, Press Vents and Rotary Valve be routed to the Biofilter (BF). Additionally, the Biofilter shall have a minimum 90% control efficiency for Methanol and Formaldehyde.
- Conditions 5.1.12 and 5.1.13 contain hourly and annual emission limits for CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub>, and VOCs. These conditions were revised to replace E7, E8, E9, E11a, and E11b with E18.
- Condition 5.2.5 previously addressed future testing of the Press Vents (E11a,b). This condition now requires testing to demonstrate compliance with the methanol and formaldehyde emission limits of condition 5.1.8 and the percent reduction requirement of condition 5.1.11.
- Condition 5.2.8 was added requiring testing to demonstrate compliance with the VOC emission limits of condition 5.1.12 (E18 only).
- Condition 5.3.1 was removed. This condition was not carried over into R13-21920.
- Condition 5.4.12 was added requiring the installation and operation of a continuous parameter monitoring system (CPMS).

The following additional changes were made:

- A typographical error was corrected in condition 5.5.2. “45CFR34” was corrected to read “45CSR34”.
- Reference to the Fiber Dryer (D1) was removed from condition 4.1.12.a. The fiber dryer is not subject to 40 C. F.R. 63, Subpart DDDDD.

#### **Removal of Compliance Plan (Section 5.6)**

This compliance plan was removed. The 40 C.F.R. Part 63, Subpart DDDD Table 1A emission limit of 0.039 lb/ODT for the rotary valve is no longer applicable since the rotary valve is now controlled by an add-on control system, the Biofilter, as described in 40 C.F.R. §63.2240(b). Conditions 5.6.1 and 5.6.2 were replaced with similar language in Conditions 5.5.3 and 5.5.4. Condition 5.6.3 was replaced with similar language in condition 5.4.13.

#### **Non-Applicability Determinations**

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

Greenhouse Gas Tailoring Rule: There have been no changes that would have triggered a PSD permit. As such, there are no applicable GHG permitting requirements.

40 C.F.R. Part 64 - Compliance Assurance Monitoring (CAM) – The permittee has previously submitted CAM plans in accordance with the CAM rule. The changes made with this modification do not affect the CAM plans.

#### **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: February 14, 2013  
Ending Date: March 18, 2013

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

Rex Compston, P.E.  
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**

Rex Compston, P.E.  
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. 1209 • Fax: 304/926-0478

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

Not applicable.