

# Fact Sheet



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

Permit Number: **R30-02300015-2006**  
Application Received: **March 31, 2003**  
Plant Identification Number: **023-00015**  
Permittee: **JPC Limited Liability Company**  
Facility Name: **Allegheny Wood Products, Inc., Plant #8**  
Mailing Address: **P.O. Box 5, Petersburg, WV 26847**

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Physical Location:	Petersburg, Grant County, West Virginia
UTM Coordinates:	660.41 km Easting • 4316.88 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. Plant #8 is past Plant #4 on the right.

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### **Facility Description**

Allegheny Wood Products, Inc. Plant #8 is a lumber/wood products facility covered by Standard Industrial Classification (SIC) 2421. The station 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 and planing facility, and processes scrap wood to be used as fuel for their boiler. There is one (1) pre-drier and three (3) drying kilns at the facility which have no emissions associated with their operation. The kilns and the pre-drier are steam heated.

**Emissions Summary**

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Criteria Pollutants</b>	<b>Potential Emissions</b>	<b>2004 Actual Emissions</b>
Carbon Monoxide (CO)	80.59*	25.8
Nitrogen Oxides (NO <sub>x</sub> )	10.51*	6.4
Particulate Matter (PM <sub>10</sub> )	16.64*	10.28
Sulfur Dioxide (SO <sub>2</sub> )	0.66*	0
Volatile Organic Compounds (VOC)	7.88*	0.809

*\*Potential emissions are from the boiler and are calculated from the R13-1154 permit limits. .*

**Title V Program Applicability Basis**

Although this facility does not have the potential to emit over 100 tons per year of criteria pollutants or over 10 tons per year of a single HAP/25 tons per year of aggregate HAPs, JPC Limited liability Company’s Allegheny Wood Products Inc., Plant #8 is contiguous with Allegheny Wood Products Inc., Plant #4. Since Plant #4 is required to have a Title V operating permit, Plant #8 is also 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	Control of Particulate Matter Emissions From 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	Standby plans for emergency episodes.
	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources
	45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40CFR Part 60
	45CSR30	Operating permit requirement.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	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	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

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, 45CSR15, 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> )
R13-1154	October 31, 1989	
CO-R30-E-2000-36	October 18, 2000	

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

- 45CSR2 - *To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.*
  - The Opacity limit for stack "002E" is 10% based on a six minute block average.
    - 45CSR§2-8.4.c. and 45CSR§2A-3.1.b. exempt fuel burning units with a design heat input of less than 100 mmBtu/hr from periodic visible emissions testing and/or the use of continuous opacity monitors (COMS). Since the design heat input for the boiler is 15.0 mmBtu/hr, no requirements for visible emissions testing or the use of COMS are included in the permit.
  - The rated design heat input (DHI) for the boiler is 15.0 mmBtu/hr. The boiler is defined as a type "c" fuel burning unit and as such would have a particulate weight emission limit of 4.5 lb/hr in accordance with 45CSR§2-4.1.c. However, the boiler will be held to a more stringent PM emission limit of 3.8 lb/hr established in permit R13-1154. Therefore the Rule 2 limit is streamlined with the more stringent limit of 3.8 lb/hr.
    - Compliance will be demonstrated as described in #4 below.
- 45CSR7- *To Prevent And Control Particulate Matter Air Pollution From Manufacturing Processes And Associated Operations*
  - Visible emissions from any process source operation (emission point 003E) shall not exceed twenty (20) percent opacity.
    - Compliance with opacity limit will primarily be demonstrated by monthly Method 22-like visible emission checks by an observer trained but not necessarily certified in Method 22 to

determine if visible emissions exist. If visible emissions are observed during these checks or at any other time, tests in accordance with tests in accordance with 45CSR§§7A-2.1.a. and 2.1.b. shall be conducted to determine the magnitude of the visible emissions

3. 45CSR10 - *To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.*

→ The allowable SO<sub>2</sub> emission limit for the boiler discharging though “002E” is established in 45CSR§10-3.3.f. as the product of 3.2 and the total design heat input. The rated design heat input (DHI) for the boiler is 15.0 mmBtu/hr. Using the calculation procedure (3.2 lb/mmBtu x TDHI) outlined in Section 3.3.f. of 45CSR10, the allowable SO<sub>2</sub> emission limit for the boiler is established as (3.2 lb/mmBtu x 15.0 mmBtu/hr) which equals 48.0 lb/hr. However, the boiler will be held to a more stringent SO<sub>2</sub> emission limit of 0.15 lb/hr established in permit R13-1154. Therefore the Rule 10 limit is streamlined with the more stringent limit of 0.15 lb/hr.

- Compliance will be demonstrated as described in #4 below.

4. 45CSR13 – Permit No. R13-1154 – *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*

The following specific requirements are established in this permit:

→ Emissions from the stack venting the wood-fired boiler shall not exceed the following limitations:

Pollutant	Emission Limits
	(lb/hr)
PM	3.8
SO <sub>2</sub>	0.15
NO <sub>x</sub>	2.4
CO	18.4
VOC	1.8

- Compliance shall be demonstrated by operating the boiler utilizing the boiler Operations Manual submitted January 8, 2001 by Allegheny Woods Products Inc. and approved by the WVDAQ on February 6, 2001 and through record keeping of fuel quality and quantity and quarterly reports detailing the daily and monthly fuel consumption.
- Particulate emissions from the stack (003E) venting the baghouse for the manufacturing building shall not exceed 2.5 lb/hr.
- The Baghouse normally vents back into the Manufacturing facility, thus producing no air emissions, but there are exhaust ports at the bottom of the baghouse that can allow the baghouse to vent toward the ground (#003E). Compliance will be demonstrated through monthly Method 22-like observations and inspections to ensure proper maintenance and operation of the baghouse according to the manufacturers design. Records of all scheduled and non-scheduled maintenance shall be maintained and shall state any maintenance or corrective actions taken as a result of the monthly inspections, the times the baghouse was inoperable and any corrective actions taken.
- Particulate emissions from the cyclone (005C) controlling the sawmill storage silo shall not exceed 10 lb/hr

- Compliance will be demonstrated through monthly inspections to ensure proper maintenance and operation of the cyclone according to the manufacturers design. Records of all scheduled and non-scheduled maintenance shall be maintained and shall state any maintenance or corrective actions taken as a result of the monthly inspections, the times the cyclone was inoperable and any corrective actions taken.
5. CO-R-03-E-2000-36 – Consent Order (DEP/DAQ vs. Allegheny Wood Products, Inc.)
- This consent order required Allegheny Wood Products, Inc. to submit, for approval, to the DAQ a boiler operating procedure to be utilized by the operations personnel to insure conditions as demonstrated by the June 21 and September 28, 2000 stack emissions tests are maintained and the boiler is operated in compliance with all applicable regulations.
    - The operating procedures have been submitted to the DAQ and approved by the DAQ.
  - The company is required to submit quarterly reports detailing the daily and monthly fuel consumption.
    - The facility has been submitting the required reports. This requirement will be included in the Title V permit.
6. 40 CFR 60 Subpart Dc - *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*
- The boiler has a heat input below 30 mmBtu/hr. Therefore the applicable requirement from this subpart is to record and maintain records of the daily fuel consumption.
    - A daily record of the quantity of fuel combusted in the boiler will be maintained on site.

### **Non-Applicability Determinations**

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

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|--------------------------|---|
| 45CSR§§2-8.1.a. and 8.2. | The boiler's Design Heat input is less than 100 mmBtu/hr ; therefore exempt per 45CSR§2-8.4.c   |
| 45CSR§10-8.              | The boiler combusts wood alone and is 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 silo which stores wood chips for use as fuel for the boiler. Therefore the silo 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.        |
| 45CSR34                  | This Rule establishes and adopts national emission standards for hazardous air pollutants (NESHAPS) and other regulatory requirements promulgated by the USEPA pursuant to 40 CFR Part 63 and section 112 of the federal Clean Air Act, as amended. There are no current 40 CFR Part 63 Regulations which apply to this facility. |

- 40 C.F.R. 60, Subpart Dc\*  
*\*Except §60.40c, §60.41c and §60.48c.*
- The boiler is not subject to the SO<sub>2</sub> and PM standards because it is under 30 MMBtu/ht. It is, however, subject to the fuel recording provision.
- 40 CFR 63
- There are no current 40 CFR Part 63 Regulations which apply to this facility.
- 40 CFR 64
- The facility does not have a pollutant specific emissions unit with a control device in order to achieve compliance with an applicable standard or limit. Therefore, the facility is not subject to the Compliance Assurance Monitoring (CAM) rule.

### **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: March 7, 2006  
Ending Date: April 6, 2006

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.