

November 21, 2017

Mr. John A. Benedict
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, West Virginia 25304

**Re: Application for Class II Administrative Update – Conditions 4.1.3.d and 4.1.5.e
Columbia Forest Products, Craigs ville, West Virginia
Permit No. R13-1361F**

Dear Mr. Benedict,

On behalf of Columbia Forest Products located in Craigs ville, West Virginia (Columbia West Virginia), SLR International Corporation (SLR) is submitting this request for a Class II Administrative Update to Permit to Update No. R13-1361F. Columbia West Virginia is proposing to amend the following permit conditions:

- Condition 4.1.3.d to clarify the zero hazardous air pollutants (HAPs) and 0.12% by weight volatile organic compound (VOC) limits apply to the final mixture of resin as-used and not individual components of the mixture.
- Condition 4.1.5.e to remove the annual usage limits of wood patching and filling compounds. However, Columbia West Virginia will continue to maintain the current hourly and annual emission limits in this condition.

The proposed amendments will provide Columbia West Virginia greater operational flexibility to meet customer specifications while still operating within the numerical emission limits. The proposed amendments are not considered a “modification” under 45CSR13-2.17, which states a modification means any physical change in or change in method of operation of any existing stationary source. However, because the request includes removing permit limits under Permit Condition 4.1.5.e, we are requesting an administrative update to the permit.

A Title V Permit Revision form and associated information is enclosed, including a check for the application fee of \$300. The public notice language for the Class I Legal Advertisement is provided in Attachment P. An Affidavit of Publication (Public Notice) will be submitted upon receipt.

Please contact me at (503) 723-4423 or Chris Groves at (304) 742-5317 if you have any questions or comments.

Sincerely,
SLR International Corporation



Sarah D. Kronholm, P.E.
Principal Engineer

cc Mr. Chris Groves, Columbia Forest Products, West Virginia
Mr. Brent Fitzwater, Columbia Forest Products, West Virginia
Enc Attachments

APPLICATION FOR CLASS II ADMINISTRATIVE UPDATE

Columbia Forest Products
Craigsville, West Virginia

November 2017



Columbia Forest Products

Prepared for:

Columbia West Virginia Corporation

242 Callahan Road
Craigsville, West Virginia 26205

This document has been prepared by SLR International Corporation. The material and data in this report were prepared under the supervision and direction of the undersigned.



Sarah D. Kronholm, P.E.
Principal Engineer



Heather Bartlett
Principal Engineer

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1. PROJECT DESCRIPTION

Columbia Forest Products located in Craigsville, West Virginia (Columbia West Virginia) is requesting a Class II Administrative Update to Permit to Update No. R13-1361F. Columbia West Virginia is proposing to amend the following permit conditions:

- Condition 4.1.3.d to clarify the zero hazardous air pollutants (HAPs) and 0.12% by weight volatile organic compound (VOC) limits apply to the total final mixture of resin as-used and not individual components of the mixture.
- Condition 4.1.5.e to remove the annual usage limits of wood patching and filling compounds. However, Columbia West Virginia will continue to maintain the current hourly and annual emission limits in this condition.

The proposed amendments will provide Columbia West Virginia greater operational flexibility to meet customer specifications while still operating within the numerical emission limits. The proposed amendments are not considered a “modification” under 45CSR13-2.17, which states a modification means any physical change in or change in method of operation of any existing stationary source.

2. REQUESTED CHANGES TO PERMIT

Columbia West Virginia is requesting to amend Condition 4.1.3.d to clarify that the limits apply to the final mixture of resin as applied and not individual components of the mixture. Columbia West Virginia is also requesting to amend Condition 4.1.5.e to remove the annual usage limits of wood patching and filling compounds. The current condition limits the annual usage of filling compounds with VOC contents greater than 0.2% by weight but less than or equal to 14.4% by weight, to 200 gallons per year. The condition also limits the annual usage of patching or filling compounds with a VOC content of 0.2% by weight or less to 1,164,000 pounds per year.

The proposed changes are outlined below.

CURRENT PERMIT LANGUAGE	PROPOSED AMENDMENTS
<p>Condition 4.1.3.d: The permittee shall be limited to using a resins that contain zero HAPs and has a VOC content of no greater than 0.12% by weight;</p> <p>Condition 4.1.5.e: Compliance with the annual VOC emission limit in 4.1.5.d shall be met by limiting the use of patching or filling compounds to the following amounts:</p> <ol style="list-style-type: none"> 1) 200 gallons per year (gal/yr) for filling compounds having manufacturers' VOC contents greater than 0.2% by weight, but less than or equal to 14.4% by weight. For these 200 gallons: <ol style="list-style-type: none"> a) The hourly VOC emission rate of 0.31 lb/hr shall not be exceeded. b) <i>[calculations for demonstrating compliance with the hourly limit]</i> 2) 1,164,000 pounds per year of any patching or filling compounds with a VOC content of 0.2% by weight or less. 	<p>Condition 4.1.3.d: The permittee shall be limited to using resin mixtures, as applied, that contain zero HAPs and, in total, have a VOC content of no greater than 0.12% by weight;</p> <p>Condition 4.1.5.e: Compliance with the annual VOC emission limit in 4.1.5.d shall be met by limiting the use of patching or filling compounds so as not to exceed the hourly VOC emission rate of 0.31 lb/hr or the annual VOC emission limit of 1.35 ton/yr.</p> <ol style="list-style-type: none"> 1) <i>[calculations for demonstrating compliance with the hourly limit]</i>

3. APPLICATION

Columbia West Virginia is submitting an application for a Class II Administrative Update to Permit to Update No. R13-1361F. A completed R13 application is included in the following attachments.



WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY

601 57th Street, SE
Charleston, WV 25304
(304) 926-0475
www.wvdep.org/daq

**APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION
(OPTIONAL)**

PLEASE CHECK ALL THAT APPLY TO NSR (45CSR13) (IF KNOWN):

- CONSTRUCTION MODIFICATION RELOCATION
 CLASS I ADMINISTRATIVE UPDATE TEMPORARY
 CLASS II ADMINISTRATIVE UPDATE AFTER-THE-FACT

PLEASE CHECK TYPE OF 45CSR30 (TITLE V) REVISION (IF ANY):

- ADMINISTRATIVE AMENDMENT MINOR MODIFICATION
 SIGNIFICANT MODIFICATION

IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS ATTACHMENT S TO THIS APPLICATION

FOR TITLE V FACILITIES ONLY: Please refer to "Title V Revision Guidance" in order to determine your Title V Revision options (Appendix A, "Title V Permit Revision Flowchart") and ability to operate with the changes requested in this Permit Application.

Section I. General

1. Name of applicant (as registered with the WV Secretary of State's Office): Columbia West Virginia Corporation		2. Federal Employer ID No. (FEIN): 550700207	
3. Name of facility (if different from above):		4. The applicant is the: <input type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input checked="" type="checkbox"/> BOTH	
5A. Applicant's mailing address: Post Office Box 160 Craigsville, West Virginia 26205		5B. Facility's present physical address: 242 Callahan Road Craigsville, West Virginia 26205	
6. West Virginia Business Registration. Is the applicant a resident of the State of West Virginia? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO – If YES, provide a copy of the Certificate of Incorporation/Organization/Limited Partnership (one page) including any name change amendments or other Business Registration Certificate as Attachment A . – If NO, provide a copy of the Certificate of Authority/Authority of L.L.C./Registration (one page) including any name change amendments or other Business Certificate as Attachment A .			
7. If applicant is a subsidiary corporation, please provide the name of parent corporation: Columbia Forest Products			
8. Does the applicant own, lease, or have an option to buy or otherwise have control of the <i>proposed site</i> ? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO – If YES, please explain: Applicant owns the site. – If NO, you are not eligible for a permit for this source.			
9. Type of plant or facility (stationary source) to be constructed, modified, relocated, administratively updated or temporarily permitted (e.g., coal preparation plant, primary crusher, etc.): Hardwood Veneer and Plywood Manufacturing		10. Standard Industrial Classification (SIC) code for the facility: 2435	
11A. DAQ Plant ID No. (for existing facilities only): 067 - 0023		11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only): R13-1361F	

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

12A.

- For **Modifications, Administrative Updates** or **Temporary permits** at an existing facility, please provide directions to the *present location* of the facility from the nearest state road;
- For **Construction** or **Relocation permits**, please provide directions to the *proposed new site location* from the nearest state road. Include a **MAP** as **Attachment B**.

From **Craigsville**, take **Highway 150 West** approximately one mile. Turn **right** onto **Callahan Road** into the facility.

12.B. New site address (if applicable):	12C. Nearest city or town: Craigsville	12D. County: Nicholas
12.E. UTM Northing (KM): 4,243.6	12F. UTM Easting (KM): 529.9	12G. UTM Zone: 17
13. Briefly describe the proposed change(s) at the facility: Amend conditions in Permit to Modify No. R13-1361F that was issued on February 2, 2016. See the cover letter for an explanation of the requested changes.		
14A. Provide the date of anticipated installation or change: / / - If this is an After-The-Fact permit application, provide the date upon which the proposed change did happen: / /	14B. Date of anticipated Start-Up if a permit is granted: / /	
14C. Provide a Schedule of the planned Installation of/Change to and Start-Up of each of the units proposed in this permit application as Attachment C (if more than one unit is involved).		
15. Provide maximum projected Operating Schedule of activity/activities outlined in this application: Hours Per Day 24 Days Per Week 7 Weeks Per Year 52		
16. Is demolition or physical renovation at an existing facility involved? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
17. Risk Management Plans. If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see www.epa.gov/ceppo), submit your Risk Management Plan (RMP) to U. S. EPA Region III.		
18. Regulatory Discussion. List all Federal and State air pollution control regulations that you believe are applicable to the proposed process (<i>if known</i>). A list of possible applicable requirements is also included in Attachment S of this application (Title V Permit Revision Information). Discuss applicability and proposed demonstration(s) of compliance (<i>if known</i>). Provide this information as Attachment D .		
Section II. Additional attachments and supporting documents.		
19. Include a check payable to WVDEP – Division of Air Quality with the appropriate application fee (per 45CSR22 and 45CSR13).		
20. Include a Table of Contents as the first page of your application package.		
21. Provide a Plot Plan , e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is or is to be located as Attachment E (Refer to Plot Plan Guidance) . - Indicate the location of the nearest occupied structure (e.g. church, school, business, residence).		
22. Provide a Detailed Process Flow Diagram(s) showing each proposed or modified emissions unit, emission point and control device as Attachment F .		
23. Provide a Process Description as Attachment G . - Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable).		
All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.		

24. Provide **Material Safety Data Sheets (MSDS)** for all materials processed, used or produced as **Attachment H**.
 – For chemical processes, provide a MSDS for each compound emitted to the air.

25. Fill out the **Emission Units Table** and provide it as **Attachment I**.

26. Fill out the **Emission Points Data Summary Sheet (Table 1 and Table 2)** and provide it as **Attachment J**.

27. Fill out the **Fugitive Emissions Data Summary Sheet** and provide it as **Attachment K**.

28. Check all applicable **Emissions Unit Data Sheets** listed below:

<input type="checkbox"/> Bulk Liquid Transfer Operations	<input type="checkbox"/> Haul Road Emissions	<input type="checkbox"/> Quarry
<input type="checkbox"/> Chemical Processes	<input type="checkbox"/> Hot Mix Asphalt Plant	<input type="checkbox"/> Solid Materials Sizing, Handling and Storage Facilities
<input type="checkbox"/> Concrete Batch Plant	<input type="checkbox"/> Incinerator	<input type="checkbox"/> Storage Tanks
<input type="checkbox"/> Grey Iron and Steel Foundry	<input type="checkbox"/> Indirect Heat Exchanger	
<input type="checkbox"/> General Emission Unit, specify		

Fill out and provide the **Emissions Unit Data Sheet(s)** as **Attachment L**.

29. Check all applicable **Air Pollution Control Device Sheets** listed below:

<input type="checkbox"/> Absorption Systems	<input type="checkbox"/> Baghouse	<input type="checkbox"/> Flare
<input type="checkbox"/> Adsorption Systems	<input type="checkbox"/> Condenser	<input type="checkbox"/> Mechanical Collector
<input type="checkbox"/> Afterburner	<input type="checkbox"/> Electrostatic Precipitator	<input type="checkbox"/> Wet Collecting System
<input type="checkbox"/> Other Collectors, specify		

Fill out and provide the **Air Pollution Control Device Sheet(s)** as **Attachment M**.

30. Provide all **Supporting Emissions Calculations** as **Attachment N**, or attach the calculations directly to the forms listed in Items 28 through 31.

31. **Monitoring, Recordkeeping, Reporting and Testing Plans.** Attach proposed monitoring, recordkeeping, reporting and testing plans in order to demonstrate compliance with the proposed emissions limits and operating parameters in this permit application. Provide this information as **Attachment O**.
 ➤ Please be aware that all permits must be practically enforceable whether or not the applicant chooses to propose such measures. Additionally, the DAQ may not be able to accept all measures proposed by the applicant. If none of these plans are proposed by the applicant, DAQ will develop such plans and include them in the permit.

32. **Public Notice.** At the time that the application is submitted, place a **Class I Legal Advertisement** in a newspaper of general circulation in the area where the source is or will be located (See 45CSR§13-8.3 through 45CSR§13-8.5 and **Example Legal Advertisement** for details). Please submit the **Affidavit of Publication** as **Attachment P** immediately upon receipt.

33. **Business Confidentiality Claims.** Does this application include confidential information (per 45CSR31)?
 YES NO
 ➤ If **YES**, identify each segment of information on each page that is submitted as confidential and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's "**Precautionary Notice – Claims of Confidentiality**" guidance found in the **General Instructions** as **Attachment Q**.

Section III. Certification of Information

34. **Authority/Delegation of Authority.** Only required when someone other than the responsible official signs the application. Check applicable **Authority Form** below:

<input type="checkbox"/> Authority of Corporation or Other Business Entity	<input type="checkbox"/> Authority of Partnership
<input type="checkbox"/> Authority of Governmental Agency	<input type="checkbox"/> Authority of Limited Partnership

Submit completed and signed **Authority Form** as **Attachment R**.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

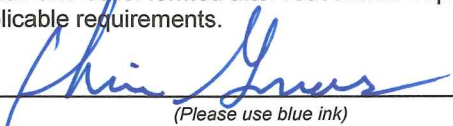
35A. **Certification of Information.** To certify this permit application, a Responsible Official (per 45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

Certification of Truth, Accuracy, and Completeness

I, the undersigned **Responsible Official** / **Authorized Representative**, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

SIGNATURE  DATE: 11/15/17
(Please use blue ink) (Please use blue ink)

35B. Printed name of signee: Chris Groves		35C. Title: Plant Manager
35D. E-mail: cgroves@cfpwood.com	36E. Phone: (304) 742-5317	36F. FAX: (304) 742-5167
36A. Printed name of contact person (if different from above): Brent Fitzwater		36B. Title: Quality Specialist
36C. E-mail: bfitzwater@cfpwood.com	36D. Phone: (304) 742-5317	36E. FAX: (304) 742-5167

PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:

- | | |
|--|---|
| <input checked="" type="checkbox"/> Attachment A: Business Certificate | <input type="checkbox"/> Attachment K: Fugitive Emissions Data Summary Sheet |
| <input type="checkbox"/> Attachment B: Map(s) | <input type="checkbox"/> Attachment L: Emissions Unit Data Sheet(s) |
| <input checked="" type="checkbox"/> Attachment C: Installation and Start Up Schedule | <input type="checkbox"/> Attachment M: Air Pollution Control Device Sheet(s) |
| <input checked="" type="checkbox"/> Attachment D: Regulatory Discussion | <input type="checkbox"/> Attachment N: Supporting Emissions Calculations |
| <input type="checkbox"/> Attachment E: Plot Plan | <input type="checkbox"/> Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans |
| <input type="checkbox"/> Attachment F: Detailed Process Flow Diagram(s) | <input checked="" type="checkbox"/> Attachment P: Public Notice |
| <input type="checkbox"/> Attachment G: Process Description | <input type="checkbox"/> Attachment Q: Business Confidential Claims |
| <input type="checkbox"/> Attachment H: Material Safety Data Sheets (MSDS) | <input type="checkbox"/> Attachment R: Authority Forms |
| <input type="checkbox"/> Attachment I: Emission Units Table | <input type="checkbox"/> Attachment S: Title V Permit Revision Information |
| <input type="checkbox"/> Attachment J: Emission Points Data Summary Sheet | <input checked="" type="checkbox"/> Application Fee |

Please mail an original and three (3) copies of the complete permit application with the signature(s) to the DAQ, Permitting Section, at the address listed on the first page of this application. Please DO NOT fax permit applications.

FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE:

- Forward 1 copy of the application to the Title V Permitting Group and:
- For Title V Administrative Amendments:
 - NSR permit writer should notify Title V permit writer of draft permit,
- For Title V Minor Modifications:
 - Title V permit writer should send appropriate notification to EPA and affected states within 5 days of receipt,
 - NSR permit writer should notify Title V permit writer of draft permit.
- For Title V Significant Modifications processed in parallel with NSR Permit revision:
 - NSR permit writer should notify a Title V permit writer of draft permit,
 - Public notice should reference both 45CSR13 and Title V permits,
 - EPA has 45 day review period of a draft permit.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

ATTACHMENT A

BUSINESS CERTIFICATE

**WEST VIRGINIA
STATE TAX DEPARTMENT
BUSINESS REGISTRATION
CERTIFICATE**

ISSUED TO:
**COLUMBIA WEST VIRGINIA CORPORATION
RT 41 W
CRAIGSVILLE, WV 26205-0000**

BUSINESS REGISTRATION ACCOUNT NUMBER: 1041-1417

This certificate is issued on: **08/16/2011**

*This certificate is issued by
the West Virginia State Tax Commissioner
in accordance with Chapter 11, Article 12, of the West Virginia Code*

*The person or organization identified on this certificate is registered
to conduct business in the State of West Virginia at the location above.*

This certificate is not transferrable and must be displayed at the location for which issued.

This certificate shall be permanent until cessation of the business for which the certificate of registration was granted or until it is suspended, revoked or cancelled by the Tax Commissioner.

Change in name or change of location shall be considered a cessation of the business and a new certificate shall be required.

TRAVELING/STREET VENDORS: Must carry a copy of this certificate in every vehicle operated by them.
CONTRACTORS, DRILLING OPERATORS, TIMBER/LOGGING OPERATIONS: Must have a copy of this certificate displayed at every job site within West Virginia.

ATTACHMENT B

MAP – NOT APPLICABLE

ATTACHMENT C

INSTALLATION AND START-UP SCHEDULE

Installation and Start-Up Schedule

There is no installation or start up associated with the proposed amendments.



ATTACHMENT D

REGULATORY DISCUSSION

Regulatory Discussion

Modification

Per 45CSR13-2.17, a modification for the purpose of the rule means any physical change in or change in the method of operation of any existing stationary source, excluding any emissions unit which meets or falls below the criteria delineated in Table 45-13B, which:

- a) Results in an emissions increase of six (6) pounds per hour and ten (10) tons per year or more, or more than 144 pounds per calendar day, of any regulated air pollutant;
- b) Results in an emissions increase of 2 pounds per hour or 5 tons per year of hazardous air pollutants considered on an aggregated basis;
- c) Results in an increase in emissions of an air pollutant listed in Table 45-13A of 10 percent or more of the amount set forth in Table 45-13A at a facility which, prior to the physical change or change in method of operation, has the potential to emit the air pollutant at or above the amount set forth in Table 45-13A, provided that nothing in this subdivision shall affect the facility's obligation to comply with 45CSR27; and
- d) Results in an increase in emissions of any air pollutant listed in Table 45-13A that would in turn result in total emissions of the air pollutant at the stationary source equal to or greater than the amounts in Table 45-13A.

The proposed amendments to Conditions 4.1.3.d and 4.1.5.e of Permit to Update No. R13-1361F are not considered modifications under 45CSR13. The change to Condition 4.1.3.d is a clarification of the current language. The facility will continue to maintain the current hourly and annual emission limits in Condition 4.1.5.e. Therefore, an application for permit or permit modification is not required.

Administrative Update

Permit to Update No. R13-1361F Condition 4.1.3.d requires the use of resins containing zero HAPs and a VOC content of no greater than 0.12% by weight. Columbia West Virginia requests a clarification that the VOC limitation of 0.12% by weight applies in total to the amount of resins regulated under Condition 4.1.3.d. The VOC limitation of 0.12% by weight would remain, as would the requirement that the resins used contain zero HAPs.

Permit to Update No. R13-1361F Condition 4.1.5.e limits the annual usage of patching and filling compounds with VOC contents greater than 0.2% by weight but less than or equal to 14.4% by weight, to 200 gallons per year. The condition also limits the annual usage of patching or filling compounds with a VOC content of 0.2% by weight or less to 1,164,000 pounds per year. Columbia West Virginia requests that these annual usage limits be removed from Condition 4.1.5.e, as Condition 4.1.5.e already restricts the VOC emissions of patching or filling compounds to 0.31 pounds per hour and 1.35 tons per year. Additionally, Condition 3.1.7.e also restricts the facility-wide VOC emissions to 98.6 tons per year.

Under 45CSR13-4.2.b.1, Class II administrative updates apply to changes in a permit condition "as necessary to allow changes in operating parameters, emission points, control equipment or any other aspect of a source which results in an increase or no change in the emission of any existing regulated air pollutant or any new regulated air pollutant." Other minor changes are also applicable to Class II administrative updates, under 45CSR13-4.2.b.2. Because the proposed permit amendments would not increase the emission limits for the facility, and are not considered modifications under 45CSR13-2.17

(which states that a modification is any physical change in or change in the method of operation of any existing stationary source), the proposed changes should be managed as a Class II administrative update.

ATTACHMENT E

PLOT PLAN – NOT APPLICABLE

ATTACHMENT F

DETAILED PROCESS FLOW DIAGRAM(S) – NOT APPLICABLE

ATTACHMENT G

PROCESS DESCRIPTION – NOT APPLICABLE

ATTACHMENT H

SAFETY DATA SHEET (SDS) – NOT APPLICABLE

ATTACHMENT I

EMISSION UNIT TABLE – NOT APPLICABLE

ATTACHMENT J

EMISSION POINTS DATA SUMMARY SHEET – NOT APPLICABLE

ATTACHMENT K

FUGITIVE EMISSIONS DATA SUMMARY SHEET – NOT APPLICABLE

ATTACHMENT L

EMISSIONS UNIT DATA SHEET(S) – NOT APPLICABLE

ATTACHMENT M

AIR POLLUTION CONTROL DEVICE SHEET(S) – NOT APPLICABLE

ATTACHMENT N

SUPPORTING EMISSIONS CALCULATIONS – NOT APPLICABLE

ATTACHMENT O

MONITORING, RECORDKEEPING, REPORTING, AND TESTING PLANS – NOT APPLICABLE

ATTACHMENT P

PUBLIC NOTICE

LEVEL A PUBLIC NOTICE
AIR QUALITY PERMIT NOTICE
Notice of Application

Notice is given that Columbia Forest Products (Columbia West Virginia) has applied to the West Virginia Department of Environmental Protection, Division of Air Quality (DAQ), for a Class II Administrative Update for their veneer and plywood manufacturing facility located on Callahan Road, near Craigsville, in Nicholas County, West Virginia. The latitude and longitude coordinates are: 38.34 degrees North and 80.67 degrees West.

This Class II Administrative Update has been submitted to amend Permit to Update No. R13-1361F that was issued to Columbia West Virginia on February 3, 2016. Permit to Update No. R13-1361F Condition 4.1.3.d requires the use of resins at the plywood press have a volatile organic compound (VOC) content of no greater than 0.12% VOC by weight. Columbia West Virginia has requested that the permit be administratively updated to clarify that the VOC limitation in Condition 4.1.3.d applies to the final mixture of resins as applied at the plywood press.

In addition, Permit to Update No. R13-1361F Condition 4.1.5.e limits the annual usage of patching or filling compounds with VOC contents greater than 0.2% by weight, but less than or equal to 14.4% by weight, to 200 gallons per year. The condition also limits the annual usage of patching or filling compounds with a VOC content of 0.2% by weight or less to 1,164,000 pounds per year. Columbia West Virginia has requested that the permit be administratively updated to remove the annual usage limits, as Condition 4.1.5.e already restricts the VOC emissions of patching or filling compounds to 0.31 pounds per hour and 1.35 tons per year. Additionally, Condition 3.1.7.e also restricts the facility-wide VOC emissions to 98.6 tons per year. These requested changes do not affect actual emissions at the facility.

Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality at 601 57th Street, SE, Charleston, WV 25304 for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499 during normal business hours.

By: Columbia West Virginia Corporation
Chris Groves
Plant Manager
P.O. Box 160
Craigsville, WV 26205

ATTACHMENT Q

BUSINESS CONFIDENTIAL CLAIMS – NOT APPLICABLE

ATTACHMENT R

AUTHORITY FORMS – NOT APPLICABLE

ATTACHMENT S

TITLE V PERMIT REVISION INFORMATION – NOT APPLICABLE