

Fact Sheet



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

Permit Number: **R30-02300015-2017**
Application Received: **February 11, 2016**
Plant Identification Number: **023-00015**
Permittee: **JPC Limited Liability Company**
Facility Name: **Plant #8**
Mailing Address: **P.O. Box 130, Petersburg, WV 26847**

Revised: NA

| | |
|--------------------|--|
| Physical Location: | Petersburg, Grant County, West Virginia |
| UTM Coordinates: | 660.643 km Easting • 4317.058 km Northing • Zone 17 |
| Directions: | From the intersection of US Route 220 and State Route 28 in Petersburg, follow US Route 220 South to Fish Hatchery Road (220/2) and turn right onto Fish Hatchery Road. Follow to Airport Road and turn right onto Airport Road. Plant #8 is the second facility on the right. |

Facility Description

JPC Limited Liability Company's, Plant #8 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 plant operates a woodworking facility, and processes scrap wood for use as fuel in the boiler. There is one (1) pre-dryer and three (3) drying kilns at the facility that operate with steam heat generated from the boiler.

Emissions Summary

| Plantwide Emissions Summary [Tons per Year] | | |
|--|----------------------------|------------------------------|
| Regulated Pollutants | Potential Emissions | 2015 Actual Emissions |
| Carbon Monoxide (CO) | 80.59 | 20.46 |
| Nitrogen Oxides (NO _x) | 10.51 | 5.12 |
| Particulate Matter (PM _{2.5}) | 8.89 | 2.21 |
| Particulate Matter (PM ₁₀) | 14.98* | 2.92 |
| Total Particulate Matter (TSP) | 62.08* | 6.0 |
| Sulfur Dioxide (SO ₂) | 0.66 | 0 |
| Volatile Organic Compounds (VOC) | 7.88 | 0.17 |

PM₁₀ is a component of TSP.

| Hazardous Air Pollutants | Potential Emissions | 2015 Actual Emissions |
|---------------------------------|----------------------------|------------------------------|
| HAPs from Combustion | 0.73 | 0.57 |

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

*Note: The PTE for PM and PM₁₀ differ from the previous fact sheet due to a change in the calculation method.

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 Plant #8 is contiguous with Allegheny Wood Products International, 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 | To Prevent And Control Particulate Air Pollution From Combustion Of Fuel In Indirect Heat Exchangers |
| 45CSR6 | Control Of Air Pollution From Combustion Of Refuse |
| 45CSR7 | To Prevent And Control Particulate Matter Air Pollution From Manufacturing Processes And Associated Operations |
| 45CSR10 | To Prevent And Control Air Pollution From The Emission Of Sulfur Oxides |
| 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, |

| | |
|----------------------------------|---|
| 45CSR16 | Temporary Permits, General Permits, And Procedures For Evaluation |
| 45CSR30 | Standards of Performance for New Stationary Sources |
| 45CSR34 | Requirements For Operating Permits |
| 40 C.F.R. Part 60, Subpart Dc | Emission Standards For Hazardous Air Pollutants |
| 40 C.F.R. Part 61, Subpart M | Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units |
| 40 C.F.R. Part 63, Subpart JJJJJ | National Emission Standard For Asbestos |
| 40 C.F.R. Part 64 | National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources |
| 40 C.F.R. Part 82, Subpart F | Compliance Assurance Monitoring |
| WV Code § 22-5-4 (a) (14) | Recycling and Emissions Reduction |
| | 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 |
|--------|--|

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>) |
|--------------------------------|------------------|--|
| R13-1154 | October 31, 1989 | |
| CO-R30-E-2000-36 | October 19, 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," which may be downloaded from DAQ's website.

Determinations and Justifications

This is a renewal of the Title V permit which was issued on October 3, 2011. Changes to the most recent version of the Title V Permit consist of the following:

1) Title V Boilerplate changes

- Condition 3.5.3. - The address for the USEPA was updated.

- 2) **Condition 4.1.14.** - The one-time energy assessment has been completed rendering this condition obsolete. Therefore, the requirements of this condition have not been included in the renewal permit. The subsequent conditions have been renumbered.
- 3) **Condition 4.1.15. (4.1.14. renewal permit)-** Since the initial compliance with the requirements of this condition has been completed, the initial compliance language has been eliminated from the last paragraph.
- 4) **Condition 4.1.16.** – The requirements of this condition have been added to Condition 4.1.14. of the renewal permit. Therefore, this condition of the current permit has been deleted and the subsequent condition in the renewal permit has been renumbered.
- 5) **Condition 4.5.4.** – The initial compliance with the work practice standard, and management practice of 40 CFR 63 Subpart JJJJJ has been completed. Therefore, the requirements of this condition have not been included in the renewal permit. The subsequent conditions have been renumbered.
- 6) **Condition 4.5.5.** – The notification requirements of this condition have been completed. Therefore, the requirements of this condition have not been included in the renewal permit. The subsequent conditions have been renumbered.
- 7) **Condition 4.5.7. (4.5.5. renewal permit)** – The language in this condition has been updated to the current language in 40 CFR §63,11225(g).

Non-Applicability Determinations

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

- | | |
|--|---|
| 45CSR§§2-8.1.a. and 8.2. | The boiler has a design heat input less than 100 mmBtu/hr; therefore it is exempt from these sections per 45CSR§2-8.4.c. |
| 45CSR§10-8. | The boiler combusts wood alone and is therefore 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 boiler. 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 Dc* <i>*Except §60.40c, §60.41c and §60.48c.</i> | The boiler is not subject to the SO ₂ and PM standards because it is under 30 mmBtu/hr heat input. It is, however, subject to the fuel recording provision. |

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: November 22, 2016
Ending Date: December 22, 2016

Point of Contact

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

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

Not applicable.