

# Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on January 4, 2017.

Permit Number: **R30-02300023-2017**  
Application Received: **December 27, 2016**  
Plant Identification Number: **03-54-023-00023**  
Permittee: **Allegheny Wood Products International, Inc.**  
Facility Name: **Plant #4**  
Mailing Address: **P.O. Box 130, Petersburg, WV 26847**

Permit Action Number: *MM01*      Revised: *June 6, 2017*

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Physical Location:	Petersburg, Grant County, West Virginia
UTM Coordinates:	660.476 km Easting • 4316.993 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 and Plant #4 is on the right.

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### Facility Description

Allegheny Wood Products International, Inc. Plant #4 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 facility operates a dry kiln facility, a sawing and planing facility, and processes scrap wood to be used as fuel for the two boilers. There are thirteen (13) drying kilns at the facility that operate with steam heat generated from the boilers and which have no emissions associated with their operation.

This minor modification incorporates the modification permit R13-1869B to replace a Lambion 5.99 MMBtu/hr boiler with a Hurst 9.6 MMBtu/hr boiler.

**Emissions Summary**

The change in potential emissions are as follows:

Pollutant	Change in Potential Emissions (TPY)	
	Increase	Decrease
NO <sub>x</sub>	3.48	
CO	9.49	
PM		- 5.44
PM <sub>10</sub>		- 4.81
PM <sub>2.5</sub>		- 6.12
SO <sub>2</sub>	0.39	
VOC	0.64	

**Title V Program Applicability Basis**

With the proposed changes associated with this modification, this facility maintains the potential to emit 181 tons per year of CO. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Allegheny Wood Products International, Inc. 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:

- 45CSR2 To Prevent And Control Particulate Air Pollution From Combustion Of Fuel In Indirect Heat Exchangers
- 45CSR13 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
- 45CSR30 Requirements For Operating Permits
- 45CSR34 Emission Standards For Hazardous Air Pollutants
- 40 C.F.R. Part 63, Subpart JJJJJ National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
- WV Code § 22-5-4 (a) (14) The Secretary can request any pertinent information such as annual emission inventory reporting.

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> )
R13-1869B	March 28, 2017	

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 permit modification incorporates the modified R13-1869B permit which is to replace a Lambion 5.99 MMBtu/hr boiler with a Hurst 9.6 MMBtu/hr boiler. The R13-1869B permit has been updated to the new boilerplate format. Modifications to the Title V permit include the rearranging of some of the requirements to better match the R13-1869B requirements and the updated boilerplate. More specifically, the modification also includes the following:

- 1) The "Emission Units" table was updated to remove the Lambion boiler and add the Hurst boiler:
- 2) Updated section 1.2 with permit R13-1869B information.
- 3) Updated the citation of authority to reflect the new condition numbers associated with permit R13-1869B and to delete references to section B of permit R13-1869A. The generalized requirements of Section "B" of R13-1869A, were not transferred to R13-1869B.
- 4) **Condition 3.4.2.** – This condition has been re-written to combine the Title V permit and R13-1869B permit boilerplate language.
- 5) **Conditions 3.5.3., 3.5.5. and 3.5.6.** - These conditions were revised to incorporate Title V boilerplate changes that require electronic submittal of the Title V compliance certifications (annual and semi-annual), self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols to the WV DAQ.
- 6) **R13-1869B, Condition 4.5.2.** – This condition is applicable only to Boiler #2. However, the notification has been previously submitted thereby satisfying this requirement. Therefore, this condition has not been included in the Title V permit.
- 7) **R13-1869B, Condition 4.5.3.** – Neither boiler is subject to the emission limits in Table 1 of 40 CFR 63 Subpart JJJJJ. Therefore, this condition is not applicable to the boilers and has not been included in the Title V permit.

### Non-Applicability Determinations

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

**45CSR2** - Boiler #1 is less than 10 mmBtu/hr and therefore exempt from §4 (Weight Emission Standards), §5 (Control of Fugitive Particulate Matter), §6 (Registration), §8 (Testing, Monitoring, Recordkeeping and Reporting) and §9 (Start-ups, Shutdowns and Malfunctions) of this rule pursuant to 45CSR§2-11.1.

**45CSR10** - Boiler #1 is less than 10 mmBtu/hr and therefore exempt from §3 (SO<sub>2</sub> Weight Emission Standards), §6 (Registration), §7 (Permit), and §8 (Testing, Monitoring, Recordkeeping and Reporting) of this rule pursuant to 45CSR§10-10.1.

**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: Not Applicable for minor modifications.  
Ending Date: N/A

**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 57<sup>th</sup> 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.