

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 July 25, 2023.

Permit Number: **R30-06700023-2023**
Application Received: **March 27, 2024**
Plant Identification Number: **03-54-067-00023**
Permittee: **Columbia West Virginia Corporation**
Facility Name: **Craigsville Facility**
Mailing Address: **P.O. Box 160, Craigsville, WV 26205**

Permit Action Number: *MM01* Revised: *April 15, 2025*

Physical Location:	Craigsville, Nicholas County, West Virginia
UTM Coordinates:	529.91 km Easting • 4,243.76 km Northing • Zone 17
Directions:	From Craigsville, take Highway 150 West for approximately one mile. Turn right onto Callahan Road and into the facility.

Facility Description

The Columbia West Virginia Corporation's Craigsville Facility produces veneer and plywood from poplar veneer. Poplar veneer is dried on-site. Finishing operations include sawing, sanding, and the application of patching and filling compounds and resins.

This minor modification incorporates the revisions made with the Modification Permit R13-1361J. The revision includes increasing the annual feed rate of green, hardwood veneer to the dryers (Dryer 1 and Dryer 2) from 220,000 MSF-3/8" to 240,000 MSF-3/8" per year. This revision does not require any physical changes to be made to the facility.

SIC: 2435, NAICS: 321211

Emissions Summary

This minor modification resulted in the following changes in emissions:

Change in Facility-Wide Potential Emissions (tpy)			
Regulated Pollutant	R13-1361I PTE	R13-1361J PTE	Change in PTE
Carbon Monoxide (CO)	99.96	101.04	+ 1.08
Nitrogen Oxides (NO _x)	89.01	89.01	--
Particulate Matter (PM _{2.5})	72.0	72.40	+ 0.40
Particulate Matter (PM ₁₀)	98.23	99.53	+ 1.30
Total Particulate Matter (TSP)	108.19	110.39	+ 2.20
Sulfur Dioxide (SO ₂)	10.46	10.46	--
Volatile Organic Compounds (VOC)	109.59	118.98	+ 9.39

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	R13-1361I PTE	R13-1361J PTE	Change in PTE
Acetaldehyde	1.39	1.51	+ 0.12
Acrolein	0.20	0.21	+ 0.01
Benzene	1.70	1.70	--
Chlorine	0.32	0.32	--
Dichloromethane	0.12	0.12	--
Formaldehyde	0.35	0.38	+ 0.03
Hydrogen Chloride	0.20	0.20	--
Manganese	0.73	0.73	--
Methanol	5.39	5.82	+ 0.43
Methyl Isobutyl Ketone	3.85	4.16	+ 0.31
Phenol	0.81	0.81	--
Styrene	0.77	0.77	--
Toluene	0.37	0.37	--
Vinyl Acetate	0.28	0.28	--
Other HAPs	0.34	0.33	- 0.01
Total HAPs	16.82	17.71	+ 0.89

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 101.04 tpy of Carbon Monoxide and 118.98 tpy of Volatile Organic Compounds. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Columbia West Virginia Corporation 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:	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, Permission to Commence Construction, and Procedures for Evaluation.
	45CSR30	Requirements for Operating Permits.

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

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance
R13-1361J	October 16, 2024

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 minor modification incorporates the revisions made with the Modification Permit R13-1361J. The revision includes increasing the annual feed rate of green, hardwood veneer to the dryers (Dryer 1 and Dryer 2) from 220,000 MSF-3/8" to 240,000 MSF-3/8" per year. No physical changes will need to be made to the dryers or the facility to accommodate the increased feed rate.

The following changes have been made to the Title V operating permit for this modification:

1. Section 1.0. – Emission Units and Active R13, R14, and R19 Permits
 - a. In the Emission Units Table, the total annual design capacity of the dryers (Emission Unit IDs: Dryer 1 and Dryer 2) and the log steaming vat (Emission Unit ID: 6S) were updated to 240,000 MSF-3/8" per year. The hourly design capacities of the dryers have not changed due to this revision.
 - b. The table of Active R13, R14, and R19 Permits has been updated with R13-1361J which was issued on October 16, 2024.

2. Section 3.0. – Facility-Wide Requirements

- a. The following boilerplate changes have been made to the permit.
 - i. The citation of 3.1.6. was revised to refer to the current version of the WV Code.
 - ii. The citation of 3.3.1. was revised to refer to the current version of the WV Code.
 - iii. The following has been added to Condition 3.3.1.b.: “If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit shall be revised in accordance with 45CSR§30-6.4. or 45CSR§30-6.5., as applicable.”
- b. Due to the increased annual feed rate to the dryers, the facility-wide annual emission limits for PM₁₀, PM_{2.5}, CO, and VOCs were updated in Condition 3.1.10. of the operating permit.

3. Section 5.0. – Plywood Manufacturing Operations

- a. Due to the increased annual feed rate of green, hardwood veneer to the dryers, the annual emission limits for PM, PM₁₀, PM_{2.5}, CO, VOCs, and aggregate HAPs from the dryers were increased in Condition 5.1.1.a.

As the hourly feed rates of veneer to the dryers have not been changed, the hourly emission limits remain the same, and compliance with the PM, PM₁₀, and PM_{2.5} emission limits will ensure compliance with 45CSR§7-4.1.

- b. In Condition 5.1.1.d., the annual feed rate of green, hardwood veneer into the dryers (Dryer 1 and Dryer 2) has been revised from 220,000 MSF – 3/8” per year to 240,000 MSF – 3/8” per year.
- c. In accordance with Condition 4.1.5. of R13-1361J, the annual throughput limit of the dryers was updated in Condition 5.1.2. of the operating permit.

This revision application also included an increase to the annual PTE for VOCs and aggregate HAPs from the log steaming vat. However, although this emissions increase was accounted for, the updated emission limit was not included in Condition 4.1.5. of R13-1361J. Therefore, the updated limit was not included in the operating permit. Per the emails dated December 26, 2024, the revised emission limit for VOCs and HAPs should be considered in effect.

Non-Applicability Determinations

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

Not Applicable.

Request for Variances or Alternatives

Not Applicable.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Not Applicable.

Ending Date: Not Applicable.

Point of Contact

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

Sarah Barron
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/414-1915
sarah.k.barron@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.