

Fact Sheet



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

Permit Number: **R30-00700016-2018**
Application Received: **October 23, 2017**
Plant Identification Number: **03-54-00700016**
Permittee: **Weyerhaeuser NR Company**
Facility Name: **Sutton OSB Mill**
Mailing Address: **3601 Gauley Turnpike, Heaters, WV 26627**

Physical Location: Heaters, Braxton County, West Virginia
UTM Coordinates: 529.939 km Easting • 4,290.213 km Northing • Zone 17
Directions: Exit I-79 at the Flatwoods exit, then proceed north on Route 4/US 19 approximately 3.2 miles. The facility entrance is on the left.

Facility Description

Weyerhaeuser Sutton produces oriented strandboard (OSB) with methylene diphenyl diisocyanate (MDI) resin, phenol-formaldehyde (PF) resin, wood strands, wax, and other additives to form the surface and core layers entering the OSB press. Weyerhaeuser Sutton produces OSB using predominately hardwood.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2017 Actual Emissions
Carbon Monoxide (CO)	229	72.15
Nitrogen Oxides (NO _x)	249	115.36
Lead (Pb)	0.03	0.03
Particulate Matter (PM _{2.5})	87.8	77.84

Plantwide Emissions Summary [Tons per Year]

Regulated Pollutants	Potential Emissions	2017 Actual Emissions
Particulate Matter (PM ₁₀)	95.4	85.17
Total Particulate Matter (TSP)	95.4	85.17
Sulfur Dioxide (SO ₂)	17.9	16.10
Volatile Organic Compounds (VOC)	249	112.34

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2017 Actual Emissions
Acetaldehyde	4.89	4.47
Acrolein	1.13	1.10
Chlorine	0.44	0.35
Cumene	6.39	5.20
Formaldehyde	11.10	2.76
Methanol	34.27	1.64
Xylenes	1.96	0.04
Total HAPs	39.8*	19.27

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

* Trace HAPs not specifically listed but reflected by the total include the following: Acetophenone, Antimony, Arsenic, Benzene, Beryllium, Bis(2-ethylhexyl-phthalate), Cadmium, Carbon disulfide, Carbon tetrachloride, Chlorobenzene, Chloroform, Chromium, Cobalt, Dinitrophenol, 2,4-Dioxin (2,3,7,8-TCDD), Ethylbenzene, Hexane, Lead, Manganese, Mercury, Methyl chloride, Methyl chloroform, Methyl ethyl ketone, Methyl isobutyl ketone, Methylene chloride, Dichloromethane, Methylene diphenyl diisocyanate (MDI), Naphthalene, Nickel, Nitrophenol, 4-Pentachlorophenol, Phenol, POM, Propionaldehyde, Selenium, Styrene, Tetrachloroethylene.

Title V Program Applicability Basis

This facility has the potential to emit over 100 tons per year of criteria pollutants (NO_x, CO, and VOCs), over 10 tons per year of a single HAP, and over 25 tons per year of a combination of HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Weyerhaeuser Sutton 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Particulate matter and opacity limits for indirect heat exchangers
	45CSR6	Open burning prohibited.

	45CSR7	Particulate matter and opacity limits for manufacturing sources.
	45CSR10	Sulfur dioxide limits.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Preconstruction permits for minor sources.
	45CSR16	Emission Standards for New Stationary Sources Pursuant to 40 C.F.R. Part 60.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants Pursuant to 40 C.F.R. Part 63
	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 63, Subpart DDDD	Plywood and Composite Wood Products MACT
	40 C.F.R. Part 63, Subpart ZZZZ	RICE MACT Standards
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR27	Best Available Technology (BAT) for Toxic Air Pollutants (TAPs)

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 (if any)
R13-1761I	August 5, 2016	

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 the third Title V Permit renewal for this facility. The following changes were made to the Permit during the renewal process.

Section 1.1 Emission Units

- Corrected the design capacity of emission unit 27S (Emergency Diesel Generator) from 760 hp to 1030 hp. This did not change the engine's applicable requirements.

Section 4.0 Source-Specific Requirements

- There have been no changes to the equipment or applicable requirements of this section since the issuance of the last renewal on April 22, 2013 that were not addressed in significant modification R30-00700016-2013(SM01), except for the changes to the CAM plan described below. Reserved conditions were removed, and the conditions renumbered accordingly.
- Weyerhaeuser submitted an updated CAM Plan for the Dry Waste Baghouse system. This resulted in changes to conditions 4.2.10 and 4.4.13 (renumbered as condition 4.4.10). This new plan new changes the definition of an excursion from "when the pressure drop is greater than 5 inches of H₂O or less than 0.5 inches of H₂O" to "when the pressure drop is greater than 5 inches of H₂O or less than 0.2 inches of H₂O." This change was requested because when bags are replaced in the bag house the pressure drop across the new bags is less than the previous 0.5 H₂O limit. This was verified with records previously submitted to DAQ enforcement.

Section 5.0 40CFR63, Subpart ZZZZ, RICE Requirements [Emission Point ID (27)]

- Updated the section to include the most recent applicable requirements for an Existing Emergency Generator greater than 500 HP located at a major source of HAPs.

Non-Applicability Determinations

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

40 C.F.R. 60, Subpart Kb – "Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984." 40 C.F.R. 60, Subpart Kb applies to each storage vessel with a capacity greater than or equal to 75m³ (19,813 gallons) that is used to store volatile organic liquids for which construction, reconstruction, or modification commenced after July 23, 1984. All tanks at the facility were installed after the July 23, 1984 applicability date but are not subject to the requirements of 40 C.F.R. 60, Subpart Kb because their capacities are less than 75 m³.

40 C.F.R. 64 – Compliance Assurance Monitoring. The Biofilter's operations (added as part of R30-00700016-2013(SM01)) are included as an affected source under the PWCP MACT, 40 C.F.R. 63 Subpart DDDD which qualifies them for an exemption under the CAM applicability Section of 40 C.F.R. §64.2(b)(1)(i).

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: Tuesday, June 5, 2018
Ending Date: Thursday, July 5, 2018

Point of Contact

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

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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)

None.