Fact Sheet

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

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on December 8, 2021.

Permit Number: R30-09700029-2021(SM01)
Application Received: January 24, 2023
Plant Identification Number: 03-54-097-00029
Permittee: Weyerhaeuser Company
Facility Name: Buckhannon Facility
Mailing Address: 41 TJM Drive, Buckhannon, WV 26201

Facility Description

Weyerhaeuser Company (Weyerhaeuser) is an engineered wood products facility covered by Standard Industrial Classification (SIC) Code 2493 and the North American Industry Classification System (NAICS) Code 321219. The facility 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 consists of one (1) wood-fired furnace, one (1)
propane furnace, two (2) veneer dryers, three (3) wood presses, six (6) storage tanks of various sizes, six (6) baghouse systems, one (1) ESP, one (1) multiclone, two (2) spray booths, one (1) diesel emergency fire water pump engine, and one (1) diesel storage tank.

This modification is to add an existing 245 hp diesel fire water pump engine (006-01) and the existing 10,000-gallon diesel storage tank (006-02) to the facility's permit. The proposed units were manufactured and installed in 1995. These changes were approved under the NSR permit, R13-1843D.

**Emissions Summary**

This modification results in the following emission changes:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Change in Potential Emissions (+ or -), TPY</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>+0.13</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>+0.13</td>
</tr>
<tr>
<td>SO$_2$</td>
<td>+0.12</td>
</tr>
<tr>
<td>NO$_X$</td>
<td>+1.81</td>
</tr>
<tr>
<td>CO</td>
<td>+0.39</td>
</tr>
<tr>
<td>VOC</td>
<td>+0.14</td>
</tr>
</tbody>
</table>

**Title V Program Applicability Basis**

With the proposed changes associated with this modification, this facility maintains the potential to emit 186.06 tpy of CO, 209.86 tpy of NO$_X$, 234.54 tpy of VOC, 54.62 tpy of Methanol, and 12.2 tpy of MDI. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Weyerhaeuser Company 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 NSR Permits
- 45CSR30 Operating permit requirement
- 45CSR34 Emission Standards for Hazardous Air Pollutants

**State Only:**
None.
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:

<table>
<thead>
<tr>
<th>Permit or Consent Order Number</th>
<th>Date of Issuance</th>
<th>Permit Determinations or Amendments That Affect the Permit (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>R13-1843D</td>
<td>May 1, 2023</td>
<td></td>
</tr>
</tbody>
</table>

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
The following changes were made to the Title V permit as part of this significant modification.

1.1 Emission Units
- Added the Fire Water Pump Group 006 with the following equipment: diesel emergency fire water pump engine (006-01) and diesel storage tank (006-02).

2.0 General Conditions
- Updated condition 2.1.3 due to changes to 45CSR30 effective on March 31, 2023.
- Updated citation of condition 2.11.4.
- Removed and reserved section 2.17 due to changes to 45CSR30 effective on March 31, 2023.
- Removed citation of 45CSR38 from condition 2.22.1 since 45CSR38 has been repealed.

3.0 Facility-Wide Requirements
- Added R13 conditions to the citations of conditions 3.4.1, 3.4.4., and 3.4.5 to account for conditions that were added to R13-1843D.
- Updated US EPA's address in condition 3.5.3.
- Updated condition 3.5.4. due to changes to 45CSR30 effective on March 31, 2023.
- Removed and reserved condition 3.5.7. due to changes to 45CSR30 effective on March 31, 2023.
- Removed and reserved condition 3.5.8.a.1. due to changes to 45CSR30 effective on March 31, 2023.

4.0 Furnace Group 001
- Removed and reserved conditions 4.1.13 and 4.1.14. These conditions are no longer applicable at the facility. The permittee does not burn washwater waste, waste oils, or adsorbent material saturated with such oils in the furnace and therefore they were removed in R13-1843D.
- Removed and reserved conditions 4.4.7.b and 4.4.7.c since they were monitoring requirements to demonstrate compliance with 4.1.13 and 4.1.14.

8.0 Source Specific Requirements [emission point ID(s): PumpEng1]

- Section 8.0 was added to incorporate the applicable requirements from R13-1843D and 40 C.F.R. 63 Subpart ZZZZ for the diesel emergency fire water pump engine (006-01). The engine is an existing, emergency, compression ignition RICE, less than or equal to 500 horsepower, located at a major source of HAP emissions.

Non-Applicability Determinations
The following requirements have been determined not to be applicable to the subject facility due to the following:


Per §60.110b, the affected facility is each storage vessel with a capacity greater than or equal to 75 cubic meters (19,812.9 US liquid gallons) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification commenced after July 23, 1984.

The tank is 10,000 gallons and as such its volume/capacity is too small to be an affected facility.

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: June 7, 2023
Ending Date: July 7, 2023

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

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41286
Robert.A.Mullins@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.