

Fact Sheet



For Proposed 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 23, 2018.

Permit Number: **R30-00700016-2018**
Application Received: **August 31, 2018**
Plant Identification Number: **03-54-00700016**
Permittee: **Weyerhaeuser NR Company**
Facility Name: **Sutton OSB Mill**
Mailing Address: **3601 Gauley Turnpike, Heaters, WV 26627**

Permit Action Number: *MM01* Revised: Proposed

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.

This Minor Modification is to update the language of the permit to reflect the removal of the two Regenerative Catalytic Oxidizers (RCOs) by removing reference to the RCOs, removing language dependent upon the RCOs, and updating the Emission Units table. The two RCOs were replaced with a biological oxidation scrubber, or biofilter scrubber, under Permit R13-1761I and removed under Permit R13-1761J.

Emissions Summary

There were no changes to potential emissions as a result of this modification. Any change in potential emissions was previously addressed during the installation of the Biofilter System in 2016.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of criteria pollutants (NOx, 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR7 45CSR13 45CSR30 45CSR34 40 C.F.R. Part 63, Subpart DDDD	Particulate matter and opacity limits for manufacturing sources. Preconstruction permits for minor sources. Operating permit requirement. Emission Standards for Hazardous Air Pollutants Pursuant to 40 C.F.R. Part 63 Plywood and Composite Wood Products MACT
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

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit <i>(if any)</i>
R13-1761J	October 18, 2018	

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 a result of the issuance of R13-1761J and the removal of the RCOs.

Emission Units Table

- The control devices RCO No.1 (4440-00-10) and RCO No.2 (4460-00-10) were removed from the table.
- Updated Footnote (1) of the emission units table to reflect the removal of the RCO control devices.

4.0 Source Specific Requirements

- Updated Table 4.1.2.: Emission Limits by removing Emission Point 21⁽⁴⁾. These were the emissions limits when the RCOs were utilized during all times of “normal operation” and during times of “Energy Cell Only Mode” as defined under 4.1.3.
- Removed Footnotes (4) and (5) in Table 4.1.2 as they pertained to the operations and limits of the RCO control devices that were removed.
- Updated the following conditions to account for the removal of the RCO control devices: 4.1.3, 4.1.6, 4.2.5, 4.3.2, and 4.4.4.
- The following conditions pertained only to the operation of the RCOs and therefore were removed and reserved: 4.1.26, 4.1.27, and 4.4.13.
- Removed conditions 4.3.6 and 4.5.4, since they pertained solely to the testing and reporting of the RCOs.

Non-Applicability Determinations

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

None.

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:

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1243 • Fax: 304/926-0478
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)

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.