

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-00700016-2024**

Application Received: **January 11, 2023 (Renewal) and June 22, 2023 (SM02)**

Plant Identification Number: **03-54-007-00016**

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:	Traveling along I-79, exit at Flatwoods (Exit 67) and navigate towards U.S. Rt 19. Travel North on U.S. Rt. 19 for approximately five (5) miles and the facility will be located on your 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 predominantly hardwood.

R30-00700016-2018(SM02) incorporates changes made in R13-1761L to replace the existing two wet electrostatic precipitators (WESPs) with one WESP; revise the existing paint booths to reflect current plant configuration; and recalculate the methanol emissions from the main stack based on a different 40 CFR 63, Subpart DDDD compliance option.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2022 Actual Emissions
Carbon Monoxide (CO)	108.52	73.79
Nitrogen Oxides (NO _x)	222.52	119.05
Lead (Pb)	0.03	0.03
Particulate Matter (PM _{2.5})	87.70	78.82
Particulate Matter (PM ₁₀)	99.30	86.90
Total Particulate Matter (TSP)	99.30	86.90
Sulfur Dioxide (SO ₂)	18.06	16.44
Volatile Organic Compounds (VOC)	177.44	111.86

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2022 Actual Emissions
Acetaldehyde	5.12	4.44
Acrolein	1.21	1.10
Chlorine	0.44	0.35
Cumene	6.45	5.15
Formaldehyde	11.38	2.73
Methanol	34.98	3.11
Methylenediphenyl Diisocyanate (MDI)	0.10	0.03
Phenol	0.04	<0.01
Propionaldehyde	0.83	0.75
Xylenes	1.96	<0.01
Other HAPs*	3.51	2.93
Total HAPs	66.02	20.61

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

* Other 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, Hydrochloric Acid, Manganese, Mercury, Methyl chloride, Methyl chloroform, Methyl isobutyl ketone, Methylene chloride, Naphthalene, Dichloromethane, Nickel, Nitrophenol, 4-Pentachlorophenol, POM, 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 (<i>if any</i>)
R13-1761L	October 13, 2023	

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 fourth Title V renewal for this facility and incorporates R30-00700016-2018(SM02).

Significant Modification R30-00700016-2018(SM02) Changes

The following changes were made to the Title V Permit due to the issuance of R13-1761L.

1.1. Emission Units

- Removed Wet ESP No. 1 (4110-00-10) and Wet ESP No.2 (4120-00-10) from the control device column and replaced them with WESP (4130-00-10).
- Changed Emission Point 21 to 21A, emission point 40 and 41 to 40A, and emission point 44 and 45 to 44A.
- Added footnotes (1), (3), and (4) to the emission units table.

Section 4.0 - Source-Specific Requirements

- In condition 4.1.1, the control device ID No. for the WESP was updated in Table 4.1.1.
- In condition 4.1.2, Table 4.1.2 was updated. This includes changing emission points as described in Section 1.1; replacing Wet ESP No. 1 (4110-00-10) and Wet ESP No.2 (4120-00-10) with WESP (4130-00-10); updating the emission limits for emission points 23, 24, 40A, 42, 43, and 44A; and adding footnote (5).
- Updated condition 4.1.3 to reflect language changes made in R13-1761L.
- Updated condition 4.1.10 to reflect language changes made in R13-1761L.
- Changed Emission Point 21 to 21A, emission point 40 and 41 to 40A, and emission point 44 and 45 to 44A in conditions 4.1.14, 4.1.15, 4.2.8 (previously 4.2.7).
- Changed Emission Point 21 to 21A in conditions 4.1.18, 4.1.24, and 4.1.25.
- Updated the citations of the following conditions due to changes in R13-1761L: 4.1.28 (previously 4.1.30), 4.1.29 (previously 4.1.31), 4.1.30 (previously 4.1.32), 4.2.6 (previously 4.2.5), 4.4.3, 4.4.4, and 4.4.12.

- Added new condition 4.2.5 and renumbered remaining 4.2 conditions.
- Updated the language of conditions 4.2.9 (previously 4.2.8), 4.2.10 (previously 4.2.9), 4.4.9, 4.4.11, and 4.5.1 to account for replacement of the Wet ESP No. 1 (4110-00-10) and Wet ESP No. 2 (4120-00-10) with WESP (4130-00-10). Note: A Compliance Assurance Monitoring (CAM) Plan was submitted for the new WESP (4130-00-10). The WESP (4130-00-10) has the same monitoring requirements as the Wet ESP No. 1 (4110-00-10) and Wet ESP No. 2 (4120-00-10) except that voltage for WESP (4130-00-10) is maintained at 30kv which is part of the updates.
- Updated condition 4.3.1 to reflect language changes made in R13-1761L.

Renewal R30-00700016-2023 Changes

Section 2.0

- Updated to the most recent boiler plate language.

Section 3.0 - Facility-Wide Requirements

- Updated to the most recent boiler plate language.

Section 4.0 - Source-Specific Requirements

- Removed reserved condition 4.1.27 and renumbered the remaining conditions.
- There have been no changes to the applicable State Rules 45CSR2, 45CSR2A, 45CSR7, 45CSR10, and 45CSR27 since the last renewal. The modifications to R13-1761J and R13-1761K issued since the last renewal have already been addressed by R30-00700016-2018(MM01) & (SM01). The modifications to R13-1761L will be included in this Title V renewal as discussed above.
- Changes to Federal Regulation 40 C.F.R. 63 Subpart DDDD are proposed but have yet to be finalized.
- 40 C.F.R. 63 Subpart DDDD was revised on August 13, 2020. Table 10 to Subpart DDDD of Part 63—"Applicability of General Provisions to This Subpart" lists which general provisions apply before August 13, 2021 and which apply on and after August 13, 2021. The changes in applicability of 40 C.F.R. 63 Subpart DDDD to the general provisions resulted in the following changes to the Title V permit.
 - Removed the part of condition 4.1.7 for "Startup, Shutdown, and/or Malfunction" (SSM) events as defined within 40 CFR §63.2 since the general provisions for SSM no longer apply to 40 C.F.R 63 Subpart DDDD.
 - Removed conditions 4.1.28 and 4.5.3 since the general provisions for SSM no longer apply to 40 C.F.R 63 Subpart DDDD.
 - Removed SSM exemption in condition 4.1.29 (previously 4.1.31).
 - Renumbered conditions due to the removal of condition 4.1.28.

- The facility is complying with 40 C.F.R. 63 Subpart DDDD by limiting emissions of total HAP, measured as THC (as carbon), to 20 ppmvd. Since this compliance option has been selected, the other options in condition 4.1.29 (previously 4.1.31) were not included.
- Condition 4.4.4. previously included some record-keeping requirements by reference. These requirements have been added to the condition in their entirety.
- Condition 4.4.3 was missing the citation for 45CSR§2A-7.1.a.6 which specified the requirements for fuel burning units that use a combination of fuels. Weyerhaeuser uses natural gas and wood in their energy cells.

Section 5.0 - 40 C.F.R. 63, Subpart ZZZZ, RICE Requirements

- Emergency Diesel Generator (Emission Unit ID: 27S) is an existing emergency engine greater than 500 HP located at a major source of HAPs. There have been no changes to the applicable 40 C.F.R. 63 subpart ZZZZ requirements for this engine.

Non-Applicability Determinations

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

- a. **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.
- b. **40 C.F.R. 64 - Compliance Assurance Monitoring (CAM).** The Biofilter’s operations are included as an affected source under the Plywood and Composite Wood Products (PWCP) MACT, 40 C.F.R. 63 Subpart DDDD which qualifies them for an exemption under the CAM applicability section 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: November 21, 2023
Ending Date: December 21, 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)

(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.