

Fact Sheet



For Draft/Proposed 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 January 8, 2024.

Permit Number: **R30-00700016-2024**
Application Received: **March 14, 2024**
Plant Identification Number: **03-54-007-00016**
Permittee: **Weyerhaeuser NR Company**
Facility Name: **Sutton OSB Mill**
Mailing Address: **3601 Gauley Turnpike, Heaters, WV 26627**

Permit Action Number: *SM01* Revised: *Draft/Proposed*

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.

Emissions Summary

This modification results in the following emission changes:

Pollutant	Change in PTE (+/- TPY)
VOC	-4.40
Total HAPs	-1.77

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 108.52 tpy of CO, 222.52 tpy of NO_x, 173.04 tpy of VOC, 11.38 tpy of Formaldehyde, 34.98 tpy of Methanol, and 64.25 tpy of total HAPs. 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 NR 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:	45CSR7	To Prevent and Control Particulate Matter Air Pollution from Manufacturing Processes and Associated Operations
	45CSR13	NSR Permits
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants
	40 C.F.R. 63 Subpart DDDD	National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products
	40 C.F.R. 64	Compliance Assurance Monitoring
State Only:	N/A	

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	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-1761M	August 19, 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 Significant Modification incorporates the changes made with R13-1761M. R13-1761M is a minor NSR modification to remove the Biofilter control device and use only the recently installed (under R13-1761L) wet electrostatic precipitator (WESP) to control the facility's PM and HAP emissions; update the WESP's Control device ID to 4200-00-10 (from 4130-00-10); to replace the Main Stack 23 with the WESP Bypass Stack 21A; and to remove the permitted exemption known as the routine control device maintenance exemption (RCDME).

1.1. Emission Units

- Removed Emission Point ID 23 and updated the control device for Emission Units: 3816-00-11, 3800-00-10, 3916-00-11, 3900-00-10, 3130-00-11, 3230-00-11, 3330-00-11, 3430-00-11, and 4700-00-10.
- Updated Footnotes (2) and (4).
- Removed Footnote (3).

3.0 Facility-Wide Requirements

The following boilerplate changes have been made to the permit. These changes to the boilerplate became effective September 23, 2024.

- Condition 3.1.6 - Revised the citation to refer to the current version of the WV Code.
- Condition 3.3.1. - Revised the citation to refer to the current version of the WV Code.
- Condition 3.3.1. - Added "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."

4.0 Source-Specific Requirements

- Condition 4.1.1 - updated Control Device ID 4200-00-10 (formerly 4130-00-10).
- Condition 4.1.2
 - Replaced Control Device ID 4130-00-10 with 4200-00-10.
 - Revised the hourly and annual emission limits for Emission Point 21A
 - Removed Emission Point 23
 - Reserved Footnote (3)
 - Updated Footnotes (2) and (4)
- Condition 4.1.3
 - Removed Biofilter, Emission Point ID 23
 - Removed 4.1.3.d. for the RCDME operating scenario
- Condition 4.1.6 - removed and reserved condition.

- Conditions 4.1.14, 4.1.15, 4.1.18, 4.1.24, and 4.1.25 - removed Emission Point 23 from the citations.
- Condition 4.1.26 - removed and reserved condition.
- Conditions 4.1.29, 4.1.30, and 4.2.6 - updated conditions to reflect updated R13-1761M conditions which replaced the 40 C.F.R. 63 Subpart DDDD requirements for the biofilter with the WESP.
- Condition 4.2.8 - removed Emission Point 23 from condition.
- Conditions 4.2.9 and 4.2.10 - updated Control Device ID 4200-00-10 (formerly 4130-00-10).
- Condition 4.3.1 - replaced Emission Point 23 and Control Device ID 4130-00-10 with Emission Point 21A and Control Device ID 4200-00-10.
- Condition 4.3.2 - updated condition to reflect updated R13-1761M condition which replaced the 40 C.F.R. 63 Subpart DDDD requirements for the biofilter with the WESP.
- Conditions 4.4.9 and 4.4.11 - replaced Control Device ID 4130-00-10 with 4200-00-10.
- Condition 4.4.12 - Removed and reserved condition.
- Condition 4.5.1 - replaced Control Device ID 4130-00-10 with 4200-00-10.

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: October 22, 2024
Ending Date: November 21, 2024

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.