



September 24, 2015

Mr. William F. Durham
Director
WVDEP, Division of Air Quality
601 – 57th Street
Charleston, West Virginia 25304

Re: Weyerhaeuser, Title V Renewal Application, R30-09700029-2011

Dear Mr. Durham,

SLR International Corporation has worked with the Buckhannon facility to prepare the attached 45CSR30 Title V Renewal Application on behalf of Weyerhaeuser NR Company for their Engineered Wood Products Facility located in Buckhannon, West Virginia (Facility ID 097-00029). The facility is currently operating under Title V operating permit number R30-09700029-2011.

This renewal will encompass changes related to the new applicable requirements listed below. Weyerhaeuser is looking forward to working with the DAQ to implement the new compliance measures defined for new federal MACT standards and proposed new sealing equipment:

- Boiler MACT 40CFR63, Subpart DDDDD Standards as they relate to the 001-01 Wood Fired Furnace.
 - PM, CO, Hg, and HCL limitations for
 - Compliance demonstrated through emission testing
 - Monitoring of fuel quality and quantity as well as an oxygen trim monitoring system and ESP control
- A construction permit proposed under R13-1849C for the installation of a sealer spray booth, planned for early 2016.
 - Permit application submitted on August 11, 2014
 - Assigned to Caraline Griffith

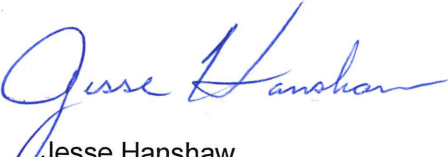
It should also be noted a Boiler MACT compliance extension request dated September 10, 2015 was submitted to the DAQ for consideration. The request concerned certain aspects of startup and shutdown work practice standards, which are expected to be addressed in EPA's reconsideration of the boiler MACT regulation before the January 31, 2016 compliance date.

September 24, 2015
William F. Durham
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In preparation for this renewal the existing terms and conditions of the permit were reviewed thoroughly for accuracy and clarity. As a result, a few areas have been identified where Weyerhaeuser's compliance measures could be streamlined to enhance compliance clarity and focus compliance efforts in the future. These comments and suggested changes are being submitted for consideration during the renewal process, as an existing permit markup at the end of this application.

Weyerhaeuser would be more than happy to discuss the details of the requested changes at your convenience. If any additional information is needed, please contact me by telephone at (304) 545-8563 or by e-mail at jhanshaw@slrconsulting.com

Sincerely,
SLR International Corporation


Jesse Hanshaw
Principal Engineer

Cc: Mr. Matthew Rutherford, Weyerhaeuser Environmental Manager



Weyerhaeuser NR Company

Buckhannon Facility

097-00029

Buckhannon, West Virginia

Title V Renewal Application

SLR Ref: 116.00687.00027

September 2015

Buckhannon Title V Renewal Application


Prepared for:

Weyerhaeuser NR Company
41 TJM Drive
Buckhannon, West Virginia 26201

This document has been prepared by SLR International Corporation. The material and data in this permit application were prepared under the supervision and direction of the undersigned.



Nathaniel Lanham
WV Operations Manager



Jesse Hanshaw, P.E.
Principal Engineer



Title V Permit Renewal Application – Table of Contents:

1. General Application Forms
2. Attachment A – Area Map: Plant Location Map
3. Attachment B – Plot Plan: Plant Process Layout
4. Attachment C – Process Flow Diagram #1: Log Processing & Heat Energy System
5. Attachment C – Process Flow Diagram #2: Parallam Manufacturing
6. Attachment C – Process Flow Diagram #3: Microllam Manufacturing
7. Attachment D – Equipment Table
8. Attachment E – Emission Units
9. Attachment G – Control Devices
10. CD(s) Contain:
 - *Copies of Documents listed above

APPLICATION FOR PERMIT

Title V Renewal Application

**Buckhannon Facility, 097-00029
Buckhannon, West Virginia**

Weyerhaeuser NR Company
41 TJM Drive
Buckhannon, West Virginia

September 2015



**WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL
PROTECTION**

DIVISION OF AIR QUALITY

601 57th Street SE

Charleston, WV 25304

Phone: (304) 926-0475

www.wvdep.org/daq

INITIAL/RENEWAL TITLE V PERMIT APPLICATION - GENERAL FORMS

Section 1: General Information

1. Name of Applicant (As registered with the WV Secretary of State's Office): Weyerhaeuser NR Company	2. Facility Name or Location: Buckhannon Facility
3. DAQ Plant ID No.: 0 9 7 — 0 0 0 2 9	4. Federal Employer ID No. (FEIN): 2 6 3 4 8 1 2 5 7
5. Permit Application Type: <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> Initial Permit <input checked="" type="checkbox"/> Permit Renewal <input type="checkbox"/> Update to Initial/Renewal Permit Application </div> <div> When did operations commence? 07/21/1995 What is the expiration date of the existing permit? 03/25/2016 </div> </div>	
6. Type of Business Entity: <div style="display: flex; justify-content: space-between;"> <div> <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership </div> <div> <input type="checkbox"/> Governmental Agency <input type="checkbox"/> Limited Partnership </div> </div>	7. Is the Applicant the: <div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Both </div> If the Applicant is not both the owner and operator, please provide the name and address of the other party. _____ _____ _____
8. Number of onsite employees: 284	
9. Governmental Code: <div style="display: flex; justify-content: space-between;"> <div> <input checked="" type="checkbox"/> Privately owned and operated; 0 <input type="checkbox"/> Federally owned and operated; 1 <input type="checkbox"/> State government owned and operated; 2 </div> <div> <input type="checkbox"/> County government owned and operated; 3 <input type="checkbox"/> Municipality government owned and operated; 4 <input type="checkbox"/> District government owned and operated; 5 </div> </div>	
10. Business Confidentiality Claims Does this application include confidential information (per 45CSR31)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, identify each segment of information on each page that is submitted as confidential, and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's "PRECAUTIONARY NOTICE-CLAIMS OF CONFIDENTIALITY" guidance.	

11. Mailing Address		
Street or P.O. Box: 41 TJM Drive		
City: Buckhannon	State: WV	Zip: 26201-
Telephone Number: (304) 472-8564	Fax Number: (304) 472-7395	

12. Facility Location		
Street: 41 TJM Drive	City: Buckhannon	County: Upshur
UTM Easting: 568.00 km	UTM Northing: 4,316.50 km	Zone: <input checked="" type="checkbox"/> 17 or <input type="checkbox"/> 18
Directions: From Charleston, Take Interstate 79 North to the Weston/Buckhannon Exit (Exit #99), Proceed on route US 33 East towards Buckhannon, approx. 14 miles, after passing by Route 20 (Phillipi/Buckhannon) Exit - Take the 2nd Exit on the left onto Industrial Park Road (Route 15/33) Continue on Industrial Park Road for approx. 1 mile until coming to Stop sign, Plant straight ahead		
Portable Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is facility located within a nonattainment area? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If yes, for what air pollutants?
Is facility located within 50 miles of another state? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If yes, name the affected state(s).
Is facility located within 100 km of a Class I Area¹? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, do emissions impact a Class I Area¹? <input type="checkbox"/> Yes <input type="checkbox"/> No		If yes, name the area(s). Dolly Sods
¹ Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Face Wilderness Area in Virginia.		

13. Contact Information		
Responsible Official: Lance Miller		Title: Mill Manager
Street or P.O. Box: 41 TJM Drive		
City: Buckhannon	State: WV	Zip: 26201-
Telephone Number: (304) 473-5490	Fax Number: (304) 472-7395	
E-mail address: Lance.Miller@Weyerhaeuser.com		
Environmental Contact: Matthew Rutherford		Title: Environmental Manager
Street or P.O. Box: 41 TJM Drive		
City: Buckhannon	State: WV	Zip: 26201-
Telephone Number: (304) 473-5407	Fax Number: (304) 472-7395	
E-mail address: Matthew.Rutherford@Weyerhaeuser.com		
Application Preparer: Jesse Hanshaw		Title: Principal Engineer
Company: SLR International Corporation		
Street or P.O. Box: 8 Capitol Street, Suite 300		
City: Charleston	State: WV	Zip: 25301-
Telephone Number: (304) 545-8563	Fax Number: (681) 205-8969	
E-mail address: jhanshaw@slrconsulting.com		

14. Facility Description

List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.

Process	Products	NAICS	SIC
Veneer Dryers	Reconstituted Wood Products	321219	2493
Microllam Presses	Reconstituted Wood Products	321219	2493
Parallam Press	Reconstituted Wood Products	321219	2493

Provide a general description of operations.

Weyerhaeuser NR Company - Buckhannon Facility is an engineered wood products facility covered by Standard Industrial Classification (SIC) code 2493. 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) stand-by 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 and two (2) spraybooths.

15. Provide an **Area Map** showing plant location as **ATTACHMENT A**.

16. Provide a **Plot Plan(s)**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as **ATTACHMENT B**. For instructions, refer to "Plot Plan - Guidelines."

17. Provide a detailed **Process Flow Diagram(s)** showing each process or emissions unit as **ATTACHMENT C**. Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

18. Applicable Requirements Summary	
Instructions: Mark all applicable requirements.	
<input checked="" type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input checked="" type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input checked="" type="checkbox"/> NESHAP (45CSR34)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input checked="" type="checkbox"/> Section 111 NSPS	<input checked="" type="checkbox"/> Section 112(d) MACT standards
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqs.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input checked="" type="checkbox"/> 45CSR27 State enforceable only rule
<input checked="" type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64)
<input type="checkbox"/> CAIR NO _x Annual Trading Program (45CSR39)	<input type="checkbox"/> CAIR NO _x Ozone Season Trading Program (45CSR40)
<input type="checkbox"/> CAIR SO ₂ Trading Program (45CSR41)	

List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.

09/24/2015

19. Non Applicability Determinations (Continued) - Attach additional pages as necessary.

List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.

☒ Permit Shield

20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements).

- 1) Requirement: 45CSR§6-3.1. Permit Condition: 3.1.1.
- 2) Requirement: 45CSR§6-3.2. Permit Condition: 3.1.2.
- 3) Requirement: 40 C.F.R. 61 & 45CSR15 Permit Condition: 3.1.3.
- 4) Requirement: 45CSR§4-3.1 Permit Condition: 3.1.4.
- 5) Requirement: 45CSR§11-5.2 Permit Condition: 3.1.6.
- 6) Requirement: W.Va. Code § 22-5-4(a)(14) Permit Condition: 3.1.7.
- 7) Requirement: 40 C.F.R. 82, Subpart F Permit Condition: 3.1.8.
- 8) Requirement: 40 C.F.R. 68 Permit Condition: 3.1.9.
- 9) Requirement: 45CSR§7-3.1., 45CSR13, R13-1843B§B.4. Permit Condition: 3.1.10.
- 10) Requirement: 45CSR§7-3.2. Permit Condition: 3.1.11.
- 11) Requirement: 45CSR§7-4.12. Permit Condition: 3.1.14.
- 12) Requirement: 45CSR§7-5.1., 45CSR13, R13-1843B§B.4. Permit Condition: 3.1.15.
- 13) Requirement: 45CSR§7-5.2., 45CSR13, R13-1843B§B.4. Permit Condition: 3.1.16.
- 14) Requirement: 45CSR§7-9.1. Permit Condition: 3.1.17.
- 15) Requirement: 45CSR§7-10.3. Permit Condition: 3.1.18.

☒ Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- 1) Reporting - Permit Condition 3.1.2.
- 2) Reporting - Permit Condition 3.1.2.
- 3) Notification - Permit Condition 3.1.3.
- 4) Recordkeeping - Permit Condition: 3.4.3.
- 5) Reporting - Permit Condition: 3.1.6.
- 6) Reporting - Permit Condition: 3.1.7.
- 7) Recordkeeping - Permit Condition: 3.1.8.
- 8) Reporting - Permit Condition: 3.1.9.
- 9) Monitoring/Recordkeeping - Permit Conditions: 3.2.1., 3.2.2., 3.2.3.
- 10) Monitoring/Recordkeeping - Permit Conditions: 3.2.1., 3.2.2., 3.2.3.
- 11) Recordkeeping (engineering design) - Permit Condition: 3.1.14.
- 12) Monitoring - Permit Condition: 3.1.30.
- 13) Monitoring - Permit Condition: 3.1.30.vi.
- 14) Notification/Reporting - Permit Condition: 3.1.17.
- 15) Notification/Reporting - Permit Condition: 3.1.18.

Are you in compliance with all facility-wide applicable requirements? ☒ Yes ☐ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

20. Facility-Wide Applicable Requirements (Continued) - Attach additional pages as necessary.

List all facility-wide applicable requirements. For each applicable requirement, include the rule citation and/or permit with the condition number.

- 16) Requirement: 45CSR13, R13-1843B§C.2. Permit Condition: 3.1.19.
- 17) Requirement: 45CSR§27-5.1., 45CSR13, R13-1843B§B.7. Permit Condition: 3.1.20.
- 18) Requirement: 45CSR13, R13-1843B§A.1. Permit Condition: 3.1.25.
- 19) Requirement: 40 C.F.R. 63, Subpart DDDD, 45CSR34 Permit Condition: 3.1.31.a.
- 20) Requirement: 45CSR§30-6.5.b. Permit Condition: 3.1.31.b.
- 21) Requirement: WV Code § 22-5-4(a)(15) and 45CSR13 Permit Condition: 3.3.1.
- 22) Requirement: 45CSR§10-8.1.b. Permit Condition: 3.3.2.
- 23) Requirement: 45CSR§30-5.1.c.2.A. Permit Condition: 3.4.1.
- 24) Requirement: 45CSR§30-5.1.c.2.B. Permit Condition: 3.4.2.
- 25) Requirement: 45CSR§30-4.4. and 5.1.c.3.D. Permit Condition: 3.5.1.
- 26) Requirement: 45CSR§30-5.1.c.3.E. Permit Condition: 3.5.2.
- 27) Requirement: 45CSR§30-8. Permit Condition: 3.5.4.
- 28) Requirement: 45CSR§30-5.3.e. Permit Condition: 3.5.5.
- 29) Requirement: 45CSR§30-5.1.c.3.A. Permit Condition: 3.5.6.
- 30) Requirement: 45CSR§30-5.1.c.3.C. and 45CSR§30-5.1.c.3.B. Permit Condition: 3.5.8.
- 31) Requirement: 45CSR§30-4.3.h.1.B. Permit Condition: 3.5.9.

☒ Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- 16) N/A - Permit Condition: 3.1.19.
- 17) N/A - Permit Condition: 3.1.20.
- 18) Notification/Recordkeeping/Testing - Permit Condition: 3.1.25.
- 19) Notification/Extension - Permit Condition: 3.1.31.a.
- 20) Notification/Extension - Permit Condition: 3.1.31.b.
- 21) Testing - Permit Condition: 3.3.1.
- 22) Testing - Permit Condition: 3.3.2.
- 23) Recordkeeping - Permit Condition: 3.4.1.
- 24) Recordkeeping - Permit Condition: 3.4.2.
- 25) Reporting - Permit Condition: 3.5.1.
- 26) Reporting - Permit Condition: 3.5.2.
- 27) Reporting - Permit Condition: 3.5.4.
- 28) Reporting - Permit Condition: 3.5.5.
- 29) Reporting - Permit Condition: 3.5.6.
- 30) Reporting - Permit Condition: 3.5.8.
- 31) Reporting, Notify & Submit Compliance Schedule - Permit Condition: 3.5.9.

Are you in compliance with all facility-wide applicable requirements? ☒ Yes ☐ No

If no, complete the **Schedule of Compliance Form** as ATTACHMENT F.

21. Active Permits/Consent Orders

[illegible]

22. Inactive Permits/Obsolete Permit Conditions

Permit Number	Date of Issuance	Permit Condition Number
R13-1843A	07/08/1997	
R13-1843R	12/09/1996	
R13-1843	05/08/1995	
R13-1703	05/11/1994	
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Section 3: Facility-Wide Emissions

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	185.67
Nitrogen Oxides (NO _x)	208.05
Lead (Pb)	1.49
Particulate Matter (PM _{2.5}) ¹	12.23
Particulate Matter (PM ₁₀) ¹	59.22
Total Particulate Matter (TSP)	214.87
Sulfur Dioxide (SO ₂)	8.76
Volatile Organic Compounds (VOC)	234.4
Hazardous Air Pollutants ²	Potential Emissions
Formaldehyde	6.79
Methanol	54.62
Phenol	0.37
MDI	12.2
Regulated Pollutants other than Criteria and HAP	Potential Emissions
¹ PM _{2.5} and PM ₁₀ are components of TSP. ² For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.	

Section 4: Insignificant Activities

24. Insignificant Activities (Check all that apply)	
<input checked="" type="checkbox"/>	1. Air compressors and pneumatically operated equipment, including hand tools.
<input type="checkbox"/>	2. Air contaminant detectors or recorders, combustion controllers or shutoffs.
<input checked="" type="checkbox"/>	3. Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
<input checked="" type="checkbox"/>	4. Bathroom/toilet vent emissions.
<input checked="" type="checkbox"/>	5. Batteries and battery charging stations, except at battery manufacturing plants.
<input type="checkbox"/>	6. Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
<input type="checkbox"/>	7. Blacksmith forges.
<input checked="" type="checkbox"/>	8. Boiler water treatment operations, not including cooling towers.
<input checked="" type="checkbox"/>	9. Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
<input type="checkbox"/>	10. CO ₂ lasers, used only on metals and other materials which do not emit HAP in the process.
<input checked="" type="checkbox"/>	11. Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
<input checked="" type="checkbox"/>	12. Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
<input checked="" type="checkbox"/>	13. Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
<input type="checkbox"/>	14. Demineralized water tanks and demineralizer vents.
<input type="checkbox"/>	15. Drop hammers or hydraulic presses for forging or metalworking.
<input checked="" type="checkbox"/>	16. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
<input type="checkbox"/>	17. Emergency (backup) electrical generators at residential locations.
<input type="checkbox"/>	18. Emergency road flares.
<input type="checkbox"/>	<p>19. Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO_x, SO₂, VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units.</p> <p>Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

24. Insignificant Activities (Check all that apply)	
<input type="checkbox"/>	<p>20. Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27.</p> <p>Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<input type="checkbox"/>	21. Environmental chambers not using hazardous air pollutant (HAP) gases.
<input type="checkbox"/>	22. Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
<input type="checkbox"/>	23. Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
<input checked="" type="checkbox"/>	24. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
<input checked="" type="checkbox"/>	25. Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
<input checked="" type="checkbox"/>	26. Fire suppression systems.
<input checked="" type="checkbox"/>	27. Firefighting equipment and the equipment used to train firefighters.
<input type="checkbox"/>	28. Flares used solely to indicate danger to the public.
<input type="checkbox"/>	29. Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
<input type="checkbox"/>	30. Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
<input checked="" type="checkbox"/>	31. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
<input type="checkbox"/>	32. Humidity chambers.
<input checked="" type="checkbox"/>	33. Hydraulic and hydrostatic testing equipment.
<input checked="" type="checkbox"/>	34. Indoor or outdoor kerosene heaters.
<input checked="" type="checkbox"/>	35. Internal combustion engines used for landscaping purposes.
<input type="checkbox"/>	36. Laser trimmers using dust collection to prevent fugitive emissions.
<input type="checkbox"/>	37. Laundry activities, except for dry-cleaning and steam boilers.
<input checked="" type="checkbox"/>	38. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
<input type="checkbox"/>	39. Oxygen scavenging (de-aeration) of water.
<input type="checkbox"/>	40. Ozone generators.
<input checked="" type="checkbox"/>	41. Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant

24. Insignificant Activities (Check all that apply)	
	owners/operators must still get a permit if otherwise requested.)
<input type="checkbox"/>	42. Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
<input type="checkbox"/>	43. Process water filtration systems and demineralizers.
<input checked="" type="checkbox"/>	44. Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
<input checked="" type="checkbox"/>	45. Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
<input checked="" type="checkbox"/>	46. Routing calibration and maintenance of laboratory equipment or other analytical instruments.
<input type="checkbox"/>	47. Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
<input type="checkbox"/>	48. Shock chambers.
<input type="checkbox"/>	49. Solar simulators.
<input type="checkbox"/>	50. Space heaters operating by direct heat transfer.
<input checked="" type="checkbox"/>	51. Steam cleaning operations.
<input type="checkbox"/>	52. Steam leaks.
<input type="checkbox"/>	53. Steam sterilizers.
<input checked="" type="checkbox"/>	54. Steam vents and safety relief valves.
<input checked="" type="checkbox"/>	55. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
<input checked="" type="checkbox"/>	56. Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
<input type="checkbox"/>	57. Such other sources or activities as the Director may determine.
<input checked="" type="checkbox"/>	58. Tobacco smoking rooms and areas.
<input type="checkbox"/>	59. Vents from continuous emissions monitors and other analyzers.

Section 5: Emission Units, Control Devices, and Emission Points

25. Equipment Table
Fill out the Title V Equipment Table and provide it as ATTACHMENT D .
26. Emission Units
For each emission unit listed in the Title V Equipment Table , fill out and provide an Emission Unit Form as ATTACHMENT E .
For each emission unit not in compliance with an applicable requirement, fill out a Schedule of Compliance Form as ATTACHMENT F .
27. Control Devices
For each control device listed in the Title V Equipment Table , fill out and provide an Air Pollution Control Device Form as ATTACHMENT G .
For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the Compliance Assurance Monitoring (CAM) Form(s) for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as ATTACHMENT H .

Section 6: Certification of Information

28. Certification of Truth, Accuracy and Completeness and Certification of Compliance

*Note: This Certification must be signed by a responsible official. The **original**, signed in **blue ink**, must be submitted with the application. Applications without an **original** signed certification will be considered as incomplete.*

a. Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

b. Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

Responsible official (type or print)

Name: Lance Miller

Title: Mill Manager

Responsible official's signature:

Signature: 

Signature Date: 9/22/15

(Must be signed and dated in blue ink)

Note: Please check all applicable attachments included with this permit application:

☒ ATTACHMENT A: Area Map

☒ ATTACHMENT B: Plot Plan(s)

☒ ATTACHMENT C: Process Flow Diagram(s)

☒ ATTACHMENT D: Equipment Table

☒ ATTACHMENT E: Emission Unit Form(s)

☐ ATTACHMENT F: Schedule of Compliance Form(s)

☒ ATTACHMENT G: Air Pollution Control Device Form(s)

☐ ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s)

All of the required forms and additional information can be found and downloaded from, the DEP website at www.wvdep.org/daq, requested by phone (304) 926-0475, and/or obtained through the mail.

ATTACHMENT A

AREA MAP: PLANT LOCATION MAP

Title V Renewal Application

**Buckhannon Facility, 097-00029
Buckhannon, West Virginia**

Weyerhaeuser NR Company
41 TJM Drive
Buckhannon, West Virginia

September 2015

ATTACHMENT B

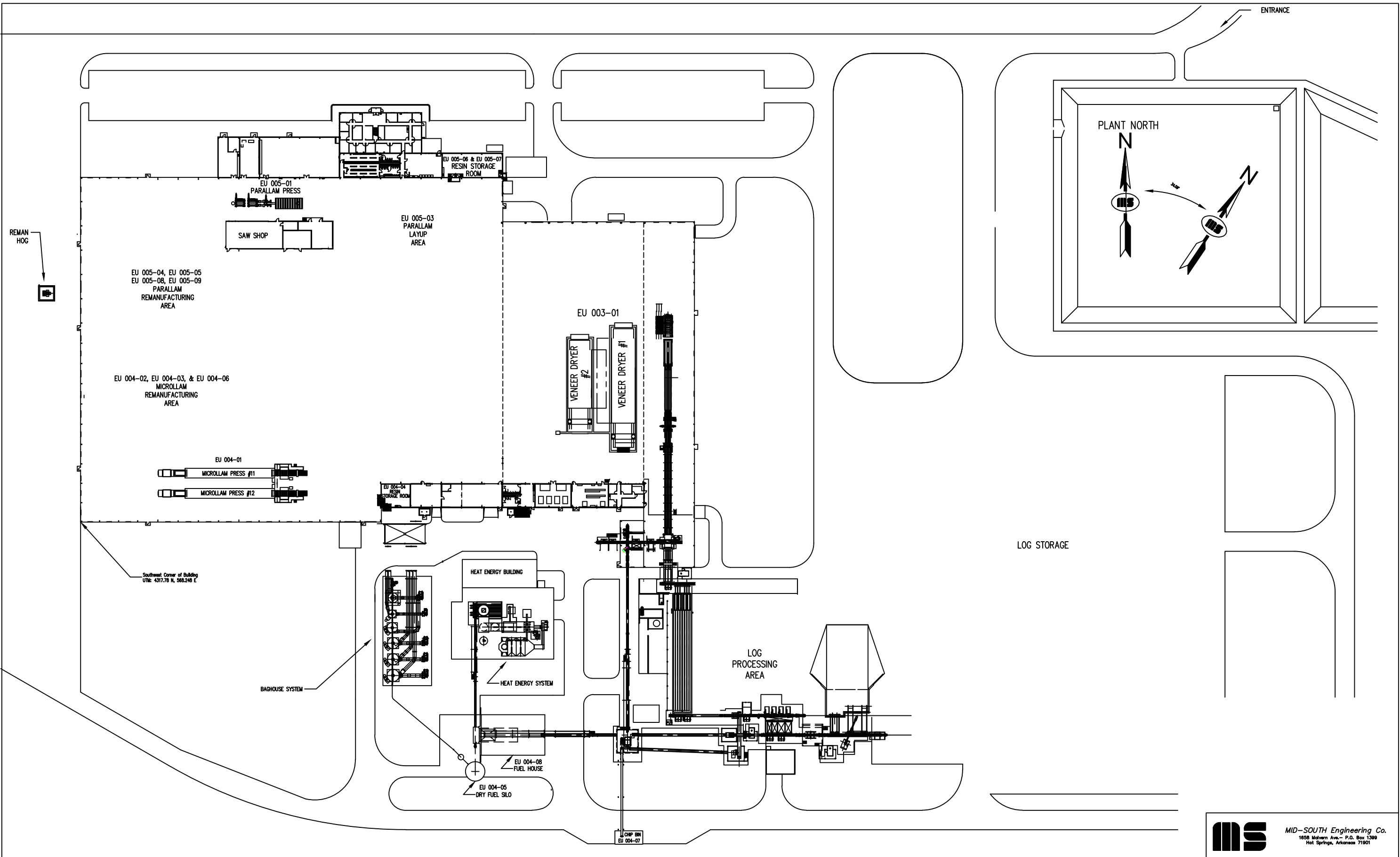
PLOT PLAN: PLANT PROCESS LAYOUT

Title V Renewal Application

**Buckhannon Facility, 097-00029
Buckhannon, West Virginia**

Weyerhaeuser NR Company
41 TJM Drive
Buckhannon, West Virginia

September 2015



NOTES:

1. THE HEAT ENERGY SYSTEM INCLUDES: WOOD-FIRED FURNACE (EU 001-01), STAND-BY FURNACE (EU 001-02), ELECTROSTATIC PRECIPITATOR (ESP), AND MULTICLONE
2. THE BAGHOUSE SYSTEM INCLUDES: BGHS1, BGHS2A, BGHS2B, BGHS3, BGHS4, AND BGHS5



MID-SOUTH Engineering Co.
1658 Malvern Ave.- P.O. Box 1399
Hot Springs, Arkansas 71901

PLANT GENERAL
EQUIPMENT LAYOUT

WEYERHAEUSER NR COMPANY
BUCKHANNON, WEST VIRGINIA

SCALE	DWG.	REV.	DATE	BY	CHKD.	APP'D.	DRAWING NO.
1"=50'			4-12-1994				1518-10000-M03
			11-11-99				24/2015

ATTACHMENT C

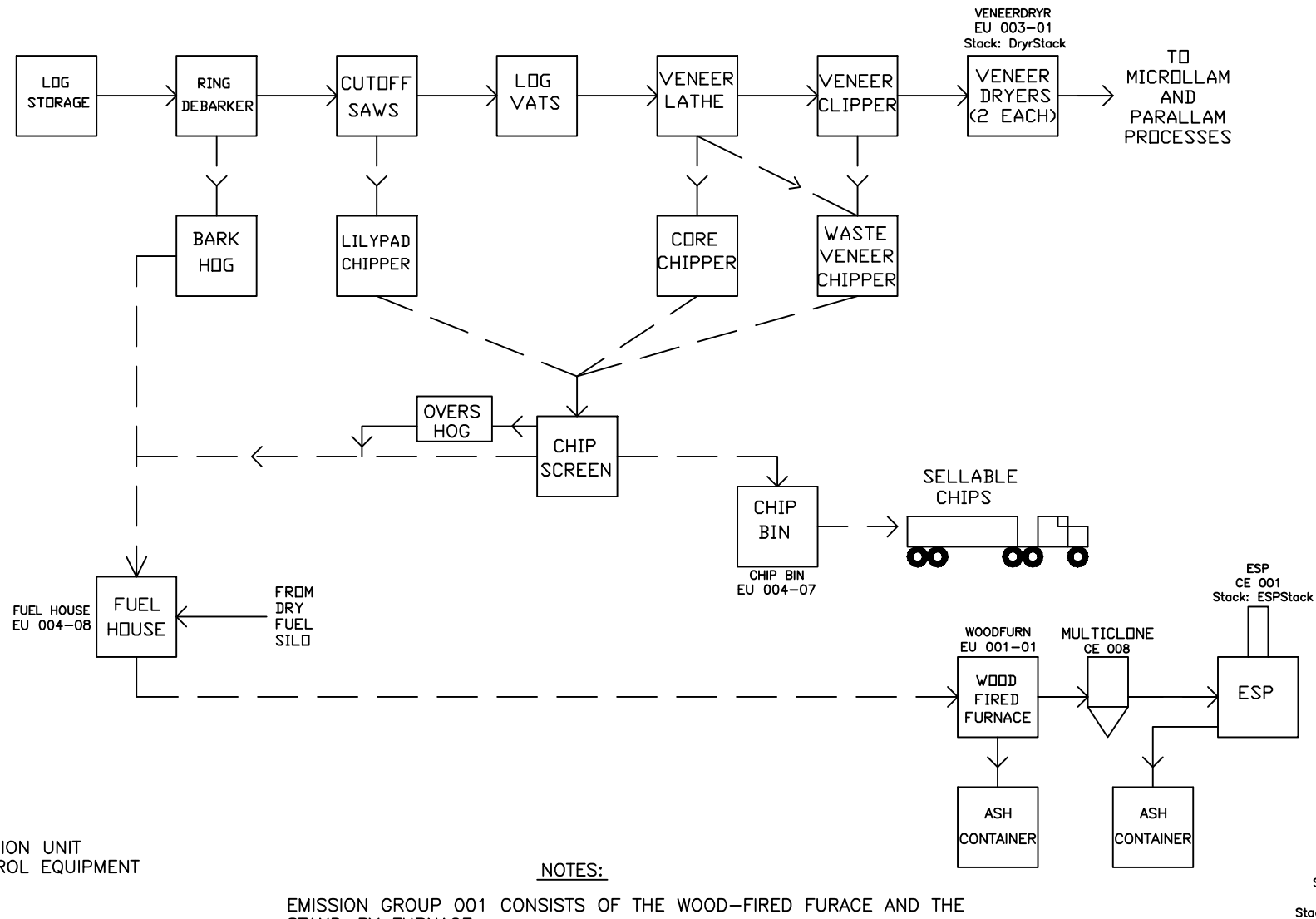
PROCESS FLOW DIAGRAM #1: LOG PROCESSING & HEAT ENERGY SYSTEM

Title V Renewal Application

**Buckhannon Facility, 097-00029
Buckhannon, West Virginia**

Weyerhaeuser NR Company
41 TJM Drive
Buckhannon, West Virginia

September 2015



EU = EMISSION UNIT
CE = CONTROL EQUIPMENT

NOTES:

EMISSION GROUP 001 CONSISTS OF THE WOOD-FIRED FURACE AND THE STAND-BY FURNACE.

EMISSION GROUP 002 CONSISTS OF THE LOG STORAGE, RING DEBARKER, CUTOFF SAWS, LOG VATS, BARK HOG, LILYPAD CHIPPER, AND CHIP SCREEN.

EMISSION GROUP 003 CONSISTS OF THE VENEER DRYERS.

THE UNIT I.D. NUMBERS AND THE LOCAL I.D.'S ARE SHOWN AT THE INDIVIDUAL UNITS.

EQUIPMENT CONTAINED WITHIN THE MANUFACTURING BUILDING INCLUDES: THE VENEER LATHE, VENEER CLIPPER, VENEER DRYERS, WASTE VENEER CHIPPER, AND CORE CHIPPER.

LEGEND

- → WOOD WASTE CONVEYORS
— → MAIN PROCESS

Weyerhaeuser NR Company
Buckhannon, WV Plant

LOG PROCESSING AND
HEAT ENERGY SYSTEMS

DRAWING NO: 09/24/2019 PFD1.DWG

ATTACHMENT C

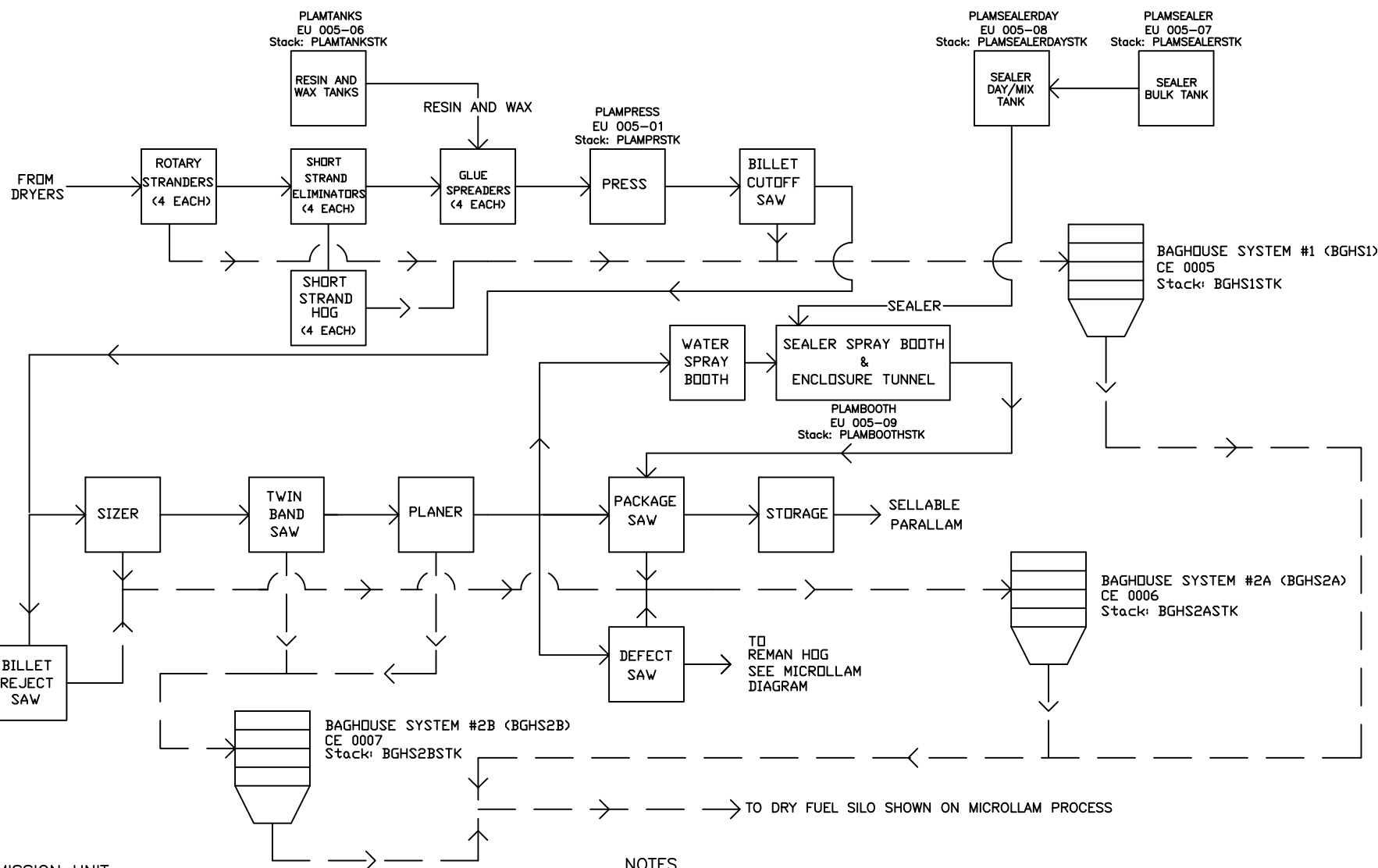
PROCESS FLOW DIAGRAM #2: PARALLAM MANUFACTURING

Title V Renewal Application

**Buckhannon Facility, 097-00029
Buckhannon, West Virginia**

Weyerhaeuser NR Company
41 TJM Drive
Buckhannon, West Virginia

September 2015



EU = EMISSION UNIT
CE = CONTROL EQUIPMENT

LEGEND

- MAIN PROCESS
- → PNEUMATIC TRANSFER FOR WOOD WASTE
- → MECHANICAL CONVEYANCE FOR WOOD WASTE

NOTES

ENTIRE AREA IS CONTAINED IN EMISSION GROUP 005.

EMISSION UNIT 005-03 (PLAMLAYUP) CONTAINS THE FOLLOWING EQUIPMENT: STRANDERS, SHORT STRAND HOGS, AND THE BILLET CUTOFF SAW.

EMISSION UNIT 005-04 (PLAMREMAN1) CONTAINS THE FOLLOWING EQUIPMENT: SIZER, BILLET REJECT SAW, PACKAGE SAW, AND DEFECT SAW.

EMISSION UNIT 005-05 (PLAMREMAN2) CONTAINS THE FOLLOWING EQUIPMENT: TWIN BAND SAW AND THE PLANER.

UNLESS LISTED IN THE NOTES SECTION, THE UNIT I.D. NUMBERS AND THE LOCAL I.D.'S ARE LISTED AT THE END OF EACH UNIT.

*Weyerhaeuser NR Company
Buckhannon, WV Plant*

PARALLAM MANUFACTURING
PROCESS

DRAWING NO: TFPD2.DWG
09/24/2015

ATTACHMENT C

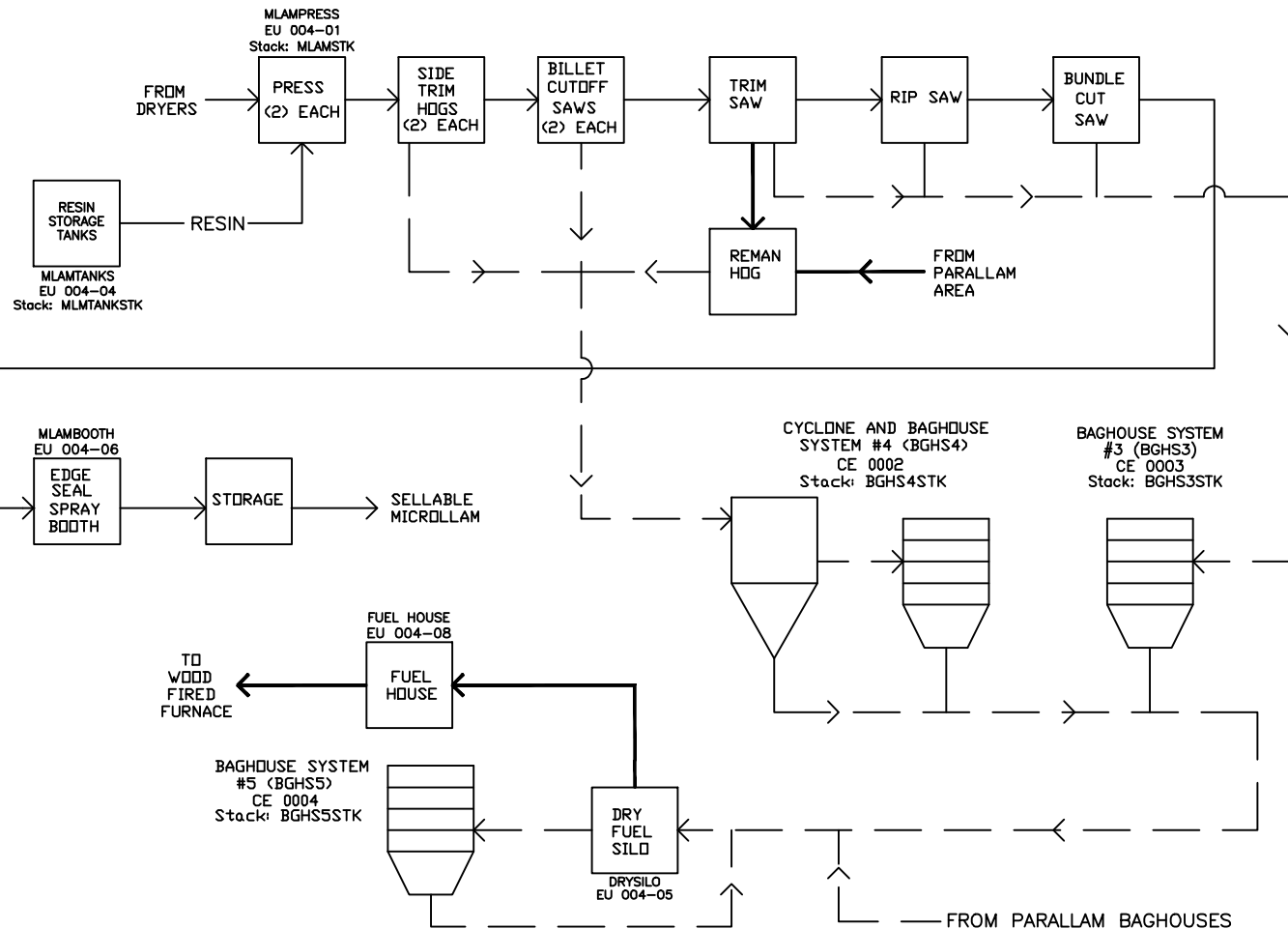
PROCESS FLOW DIAGRAM #3: MICROLLAM MANUFACTURING

Title V Renewal Application

**Buckhannon Facility, 097-00029
Buckhannon, West Virginia**

Weyerhaeuser NR Company
41 TJM Drive
Buckhannon, West Virginia

September 2015



EU = EMISSION UNIT
CE = CONTROL EQUIPMENT

LEGEND

- MAIN PROCESS
- → PNEUMATIC TRANSFER FOR WOOD WASTE
- MECHANICAL CONVEYANCE FOR WOOD WASTE

NOTES

EMISSION GROUP 004 CONSISTS OF ALL EQUIPMENT SHOWN ABOVE.

EMISSION UNIT 004-02 (MLAMREMAN1) CONSISTS OF THE FOLLOWING EQUIPMENT: SIDE TRIM HOGS, BILLET CUTOFF SAWS, AND THE REMAN HOG.

EMISSION UNIT 004-03 (MLAMREMAN2) CONSISTS OF THE FOLLOWING EQUIPMENT: TRIM SAW, RIP SAW, AND THE BUNDLE CUT SAW.

UNLESS LISTED IN THE NOTES SECTION, THE UNIT I.D. NUMBERS AND THE LOCAL I.D.'S ARE LISTED AT THE INDIVIDUAL UNITS.

Weyerhaeuser NR Company
Buckhannon, WV Plant

MICROLLAM MANUFACTURING
PROCESS

DRAWING NO: TFPD3.DWG

ATTACHMENT D

EQUIPMENT TABLE

Title V Renewal Application

Buckhannon Facility, 097-00029
Buckhannon, West Virginia

Weyerhaeuser NR Company
41 TJM Drive
Buckhannon, West Virginia

September 2015

ATTACHMENT D - Title V Equipment Table
(includes all emission units at the facility except those designated as
insignificant activities in Section 4, Item 24 of the General Forms)

Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/Modified
WoodFurn	ESP	001-01	Wood-Fired Furnance	116 MMBtu/hr	1995
WoodFurn	MClone	001-01	Wood-Fired Furnance	116 MMBtu/hr	1995
StandByFurn1		001-02	Stand-By Furnance	40 MMBtu/hr	1995
VeneerDryr		003-01	Two (2) Veneer Dryers	42,000 lbs/hr	1995
MlamPress		004-01	Two (2) Microllam Presses	456 cuft/hr	1995
MlamReman1	BGHS4	004-02	Microllam Reman Equipment #1	N/A	1995
MlamReman2	BGHS3	004-03	Microllam Reman Equipment #2	N/A	1995
MlamTanks		004-04	Microllam Resin Tanks	10,000gal each	1995
DrySilo	BGHS5	004-05	Dry Fuel Silo	26,239 cuft	1995
MlamBooth		004-06	Microllam Spray Booth	N/A	2003
Chip Bin		004-07	Storage of Green, Wet Wood Chips	13,600 cuft	1995
Fuel House		004-08	Storage of Wood Fuel	96,000 cuft	1995
PlamPress		005-01	Parallam Press	456 cuft/hr	1995
PlamLayup	BGHS1	005-03	Parallam Stranding Operation	N/A	1995
PlamReman1	BGHS2A	005-04	Parallam Reman Equipment #1	N/A	1995
PlamReman2	BGHS2B	005-05	Parallam Reman Equipment #2	N/A	1995
PlamTanks		005-06	Parallam Resin Tanks	15,000gal each	1995
E07	NA	005-07	Parallam Sealer Bulk Tank	6,000 gal	2016
E08	NA	005-08	Parallam Sealer Day Tank	350 gal	2016
E09	3C	005-09	Parallam Sealer Spray Booth	9.12 gal/hr	2016

¹For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

ATTACHMENT E

EMISSION UNIT FORMS

Title V Renewal Application

Buckhannon Facility, 097-00029
Buckhannon, West Virginia

Weyerhaeuser NR Company
41 TJM Drive
Buckhannon, West Virginia

September 2015

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 001-01	Emission unit name: WoodFurn	List any control devices associated with this emission unit: ESP MClone
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):

The wood-fired process heater is used to provide heat energy to the thermal oil system.

Wood waste (bio-mass) is used as the fuel for the wood-fired unit.

Average: 60,000 CFM - Flue gas flow

650 F - Flue gas exit temp.

35.4 ft/sec - Flue gas exis velocity

Manufacturer: Geka Thermal Systems (GTS)	Model number: GTS Job #0694	Serial number: N/A
--	---------------------------------------	------------------------------

Construction date: 03/01/1995	Installation date: 03/01/1995	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons):

116 MMBtu/hr - Heat Output

80 MMBtu/hr - Heat Input (input into thermal oil)

Maximum Hourly Throughput: Fuel - 25,550 lbs/hr	Maximum Annual Throughput: 111,930 tons	Maximum Operating Schedule: 8760 hr
---	---	---

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, is it? <input checked="" type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired
--	---

Maximum design heat input and/or maximum horsepower rating: 116 MMBtu/hr - Heat Output 80 MMBtu/hr - Heat Input (input into thermal oil system)	Type and Btu/hr rating of burners: N/A
--	--

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Wood Fuel (Heat content ranges from 4000-6500 BTU/lb)

Maximum hourly fuel usage: 25,550 lbs/hr

Maximum annual fuel usage: 111,930 tons

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Wood	N/A	N/A	4000 - 6500 BTU/lb

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	41.0	179.58
Nitrogen Oxides (NO _x)	38.5	168.63
Lead (Pb)	0.34	1.49
Particulate Matter (PM _{2.5})	0.48	2.1
Particulate Matter (PM ₁₀)	0.96	4.2
Total Particulate Matter (TSP)	3.0	13.14
Sulfur Dioxide (SO ₂)	1.5	6.57
Volatile Organic Compounds (VOC)	4.5	19.71
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.). (VOC, PM, SO ₂ , NO _x) - Rates based on source test data with the addition of correction factors to address the potential for future variations in the operation of the unit. CO - Original Regulation 13 Permit Limit. Lead - AP-42		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

- 1) Requirement: 40CFR63, Subpart DDDDD, 45CSR34 Permit Condition: 4.1.1.a.
- 2) Requirement: 45CSR§30-6.5.b. Permit Condition: 4.1.1.b.
- 3) Requirement: 45CSR§2-3.1., 45CSR13, R13-1843B§B.3. Permit Condition: 4.1.2.
- 4) Requirement: 45CSR§2-4.1. and 4.1.b., 45CSR13, R13-1843B§B.3. Permit Condition: 4.1.4.
- 5) Requirement: 45CSR§2-5.1. Permit Condition: 4.1.5.
- 6) Requirement: 45CSR§2-9.1. Permit Condition: 4.1.6.
- 7) Requirement: 45CSR§2-9.3. Permit Condition: 4.1.8.
- 8) Requirement: 45CSR§10-3.3. and 3.3.f., 45CSR13, R13-1843B§B.5. Permit Condition: 4.1.9.
- 9) Requirement: 45CSR§10-3.4. and 3.4.a., 45CSR13, R13-1843B§B.5. Permit Condition: 4.1.10
- 10) Requirement: 45CSR10-4.1. and 4.1.e. Permit Condition: 4.1.11
- 11) Requirement: 45CSR§10-4.2. Permit Condition: 4.1.12.
- 12) Requirement: 45CSR§10-9.1. Permit Condition: 4.1.13.
- 13) Requirement: 45CSR16, 40 C.F.R. § 60.43b (c), 45CSR13, R13-1843B§B.11. Permit Condition: 4.1.14.
- 14) Requirement: 45CSR16, 40 C.F.R. § 60.43b (f) Permit Condition: 4.1.15.
- 15) Requirement: 45CSR16, 40 C.F.R. § 60.43b (g) Permit Condition: 4.1.16.
- 16) Requirement: 45CSR16, 40 C.F.R. § 60.44b (h) Permit Condition: 4.1.17.
- 17) Requirement: 45CSR16, 40 C.F.R. § 60.44b (i) Permit Condition: 4.1.18.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- 1) Notification/Extension - Permit Condition: 4.1.1.a.
- 2) Notification/Extension - Permit Condition: 4.1.1.b.
- 3) Monitoring (COM)/Recordkeeping - Permit Conditions: 4.1.3., 4.2.1., 4.2.2., 4.2.3., 4.2.4., 4.2.5., 4.4.4.
- 4) Testing/Recordkeeping - Permit Conditions: 4.1.19., 4.1.20., 4.3.1., 4.3.2., 4.3.6., 4.4.1.
- 5) Monitoring - Permit Condition: 4.1.5.
- 6) Recordkeeping - Permit Condition: 4.4.1., 4.4.2., 4.4.8.1.
- 7) Reporting - Permit Condition: 4.5.1.
- 8) Testing/Recordkeeping - Permit Conditions: 4.1.20., 4.3.4., 4.4.1.
- 9) Recordkeeping - Permit Condition: 4.4.1.
- 10) Testing/Recordkeeping - Permit Conditions: 4.1.20., 4.3.4., 4.4.1.
- 11) Testing/Recordkeeping - Permit Conditions: 4.1.20., 4.3.4., 4.4.1.
- 12) Notification - Permit Condition: 4.1.13.
- 13) Testing/Recordkeeping - Permit Condition: 4.3.1., 4.3.2., 4.4.3.
- 14) Monitoring (COM)/Recordkeeping - Permit Conditions: 4.2.1., 4.2.2., 4.2.3., 4.2.4., 4.2.5., 4.4.4.
- 15) Recordkeeping - Permit Condition: 4.4.1., 4.4.2., 4.4.8.1.
- 16) Recordkeeping - Permit Condition: 4.4.1., 4.4.2., 4.4.8.1.
- 17) Recordkeeping - Permit Condition: 4.4.1., 4.4.2., 4.4.8.

Are you in compliance with all applicable requirements for this emission unit? X Yes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

- 18) Requirement: 45CSR16, 40 C.F.R. § 60.46b (b) Permit Condition: 4.1.19.
- 19) Requirement: 45CSR13, R13-1843B§A.9. Permit Condition: 4.1.20.
- 20) Requirement: 45CSR13, R13-1843B§A.7. Permit Condition: 4.1.22.
- 21) Requirement: 45CSR13, R13-1843B§A.8. Permit Condition: 4.1.23.
- 22) Requirement: 45CSR13, R13-1843B§A.13. Permit Condition: 4.1.24.
- 23) Requirement: 45CSR16, 40 C.F.R. § 60.49b (o), 45CSR13, R13-1843B§B.12. Permit Condition: 4.4.5.
- 24) Requirement: 45CSR§2-8.3.b. Permit Condition: 4.5.1.
- 25) Requirement: 45CSR16, 40 C.F.R. § 60.49b (h), 45CSR13, R13-1843B§B.12. Permit Condition: 4.5.2.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- 18) Testing/Recordkeeping - Permit Conditions: 4.1.20., 4.3.1., 4.3.2., 4.3.6., 4.4.1.
- 19) Testing/Recordkeeping - Permit Conditions: 4.3.1., 4.3.2., 4.3.4., 4.3.5., 4.3.6., 4.4.1., 4.4.2.
- 20) Recordkeeping - Permit Conditions: 4.4.1., 4.4.2., 4.4.8., 4.4.10.a.
- 21) Recordkeeping - Permit Condition: 4.4.10.b.
- 22) Recordkeeping - Permit Condition: 4.4.10.c.
- 23) Records Retention - Permit Conditions: 3.4.2., 4.4.1.
- 24) Reporting - Permit Conditions: 4.5.1., 4.5.2.
- 25) Reporting (excess emission reports) - Permit Condition: 4.5.2.

Are you in compliance with all applicable requirements for this emission unit? X Yes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 001-02	Emission unit name: StandByFurn1	List any control devices associated with this emission unit:
---	--	---

Provide a description of the emission unit (type, method of operation, design parameters, etc.):

The stand by furnace is a back-up unit for the heat energy system with a maximum design heat input of 40 MMBtu/hr.
 The purpose of the stand by furnace is to supplement the wood-fired furnace in maintaining the proper heat balance to the thermal oil system or for periods when the wood-fired furnace is down. A like kind replacement burner was installed on this furnace and started operation March 27, 2015. The new equipment is a Power Flame Burner, Model # CMR 11A-GO-30C, Serial # 031245042.

Manufacturer: Gordon Piatt Energy Group	Model number: DH-V-100/50	Serial number: N/A
---	-------------------------------------	------------------------------

Construction date: 05/01/1995	Installation date: 05/01/1995	Modification date(s): MM/DD/YYYY
---	---	--

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
40 MMBtu/hr

Maximum Hourly Throughput: 3,720 lbs/hr	Maximum Annual Throughput: 16,294 tons	Maximum Operating Schedule: 8760 hr
---	--	---

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, is it? <input checked="" type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired
--	---

Maximum design heat input and/or maximum horsepower rating: Maximum heat input: 40 MMBtu/hr Blower Motor: 60 hp	Type and Btu/hr rating of burners: Power Flame Burner Model CMR 11A-GO-30C 40 MMBtu/hr
--	--

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Natural Gas: 3,720 lbs/hr using 93 lbs/MMBtu
 Propane: 3,000 lbs/hr using 75 lbs/MMBtu

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	0.001	0	1000 BTU/cuft
Propane	0.001	0	2500 BTU/cuft

Emissions Data			
Criteria Pollutants	Potential Emissions		
	PPH	TPY	
Carbon Monoxide (CO)	1.39	6.09	
Nitrogen Oxides (NO _x)	9.0	39.42	
Lead (Pb)			
Particulate Matter (PM _{2.5})	0.16	0.7	
Particulate Matter (PM ₁₀)	0.32	1.4	
Total Particulate Matter (TSP)	1.0	4.38	
Sulfur Dioxide (SO ₂)	0.5	2.19	
Volatile Organic Compounds (VOC)	1.86	8.15	
Hazardous Air Pollutants	Potential Emissions		
	PPH	TPY	
Regulated Pollutants other than Criteria and HAP	Potential Emissions		
	PPH	TPY	
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>(PM, SO₂, NO_x) - Rates based on source test data with the addition of correction factors to address the potential for future variations in the operation of the unit.</p> <p>(VOC, CO) - Original Regulation 13 Permit Limit.</p>			

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

- 1) Requirement: 40CFR63, Subpart DDDDD, 45CSR34 Permit Condition: 4.1.1.a.
- 2) Requirement: 45CSR§30-6.5.b. Permit Condition: 4.1.1.b.
- 3) Requirement: 45CSR§2-3.1., 45CSR13, R13-1843B§B.3. Permit Condition: 4.1.2.
- 4) Requirement: 45CSR§2-4.1. and 4.1.b., 45CSR13, R13-1843B§B.3. Permit Condition: 4.1.4.
- 5) Requirement: 45CSR§2-9.1. Permit Condition: 4.1.6.
- 6) Requirement: 45CSR§10-3.3. and 3.3.f., 45CSR13, R13-1843B§B.5. Permit Condition: 4.1.9.
- 7) Requirement: 45CSR§10-3.4. and 3.4.a., 45CSR13, R13-1843B§B.5. Permit Condition: 4.1.10
- 8) Requirement: 45CSR§10-9.1. Permit Condition: 4.1.13.
- 9) Requirement: 45CSR13, R13-1843B§A.12. Permit Condition: 4.1.21.
- 10) Requirement: 45CSR16, 40 C.F.R. § 60.48c (g) Permit Condition: 4.4.6.
- 11) Requirement: 45CSR16, 40 C.F.R. § 60.48c (i) Permit Condition: 4.4.7.
- 12) Requirement: 45CSR§2-8.3.b. Permit Condition: 4.5.1.
- 13) Requirement: 45CSR16, 40 C.F.R. § 60.48c (j) Permit Condition: 4.5.3.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- 1) Notification/Extension - Permit Condition: 4.1.1.a.
- 2) Notification/Extension - Permit Condition: 4.1.1.b.
- 3) Monitoring(Visible Emission Tests)/Maintenance - Permit Conditions: 4.1.3., 4.1.7.
- 4) Testing/Recordkeeping - Permit Conditions: 4.1.21., 4.3.1., 4.3.2., 4.3.3., 4.4.1., 4.4.9.
- 5) Recordkeeping - Permit Conditions: 4.4.1., 4.4.2., 4.4.8.1.
- 6) Testing/Recordkeeping - Permit Conditions: 4.1.21., 4.3.4., 4.4.1.
- 7) Recordkeeping - Permit Condition: 4.4.1.
- 8) Notification - Permit Condition: 4.1.13.
- 9) Testing/Recordkeeping - Permit Conditions: 4.3.1., 4.3.2., 4.3.3., 4.3.4., 4.3.7., 4.3.8., 4.4.1., 4.4.2.
- 10) Recordkeeping - Permit Conditions: 4.4.8.2., 4.4.8.3.
- 11) Records Retention - Permit Conditions: 3.4.2., 4.4.1.
- 12) Reporting - Permit Condition: 4.5.1., 4.5.3.
- 13) Reporting - Permit Condition: 4.5.3.

Are you in compliance with all applicable requirements for this emission unit? XYes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 003-01	Emission unit name: VeneerDryr	List any control devices associated with this emission unit:
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):

The veneer dryers bring the moisture content of the green veneer down to levels acceptable for the production processes for the Microllam and Parallam presses.

The dryers are heated by air to oil heat exchangers, where air is heated by passing it through multiple heat exchangers that are heated by the thermal oil system.

Manufacturer: Babcock - BSH	Model number: N/A	Serial number: N/A
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Construction date: 05/01/1995	Installation date: 05/01/1995	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 42,000 lbs/hr (Dry Veneer Output)

Normal Production Rate: 1,000 cuft/hr

Maximum Production Rate: 1,400 cuft/hr

Maximum Hourly Throughput: 42,000 lbs/hr (Dry Veneer Output)	Maximum Annual Throughput: 183,960 tons (Dry Veneer)	Maximum Operating Schedule: 8760 hr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <u>X</u> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
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Maximum design heat input and/or maximum horsepower rating:	Type and Btu/hr rating of burners:
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})	1.205	5.28
Particulate Matter (PM ₁₀)	4.8	21.01
Total Particulate Matter (TSP)	24.6	107.75
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)	18	78.84
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>(PM, VOC) - Rate is established by analyzing the source test data from the December 1995 & August 2005 compliance tests and adding in correction factors to address potential variations in operation of the unit and potential variations in test methodologies.</p>		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

- 1) Requirement: 45CSR§7-4.1., 45CSR13, R13-1843B§B.4. Permit Condition: 3.1.13.
- 2) Requirement: 45CSR13, R13-1843B§A.10. Permit Condition: 3.1.22.
- 3) Requirement: 45CSR13, R13-1843B§A.5. Permit Condition: 3.1.28.
- 4) Requirement: 45CSR30§30-12.7. Permit Condition: 3.1.29.
- 5) Requirement: 45CSR§30-5.1.c. Permit Condition: 3.2.3.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- 1) Recordkeeping - Permit Condition: 3.3.3.
- 2) Testing/Reporting - Permit Condition: 3.3.3., 3.3.4.
- 3) Recordkeeping - Permit Conditions: 3.3.3.a., 3.3.4.b., 3.4.6.a.
- 4) Recordkeeping - Permit Conditions: 3.1.29., 3.3.4.b.
- 5) Monitoring(Visible Emission Tests)/Recordkeeping - Permit Condition: 3.2.3.

Are you in compliance with all applicable requirements for this emission unit? X Yes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 004-01	Emission unit name: MlamPress	List any control devices associated with this emission unit:
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Two Microllam presses that perform the pressing operations to produce Microllam (LVL) billets.

Manufacturer: Taihei Machinery Works	Model number: Press #11 & #12	Serial number: N/A
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Construction date: 05/01/1995	Installation date: 05/01/1995	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
456 cuft/hr

Maximum Hourly Throughput: 574 cuft/hr	Maximum Annual Throughput: 5,000,000 cuft	Maximum Operating Schedule: 8760 hr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <u>X</u> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
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Maximum design heat input and/or maximum horsepower rating:	Type and Btu/hr rating of burners:
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})		
Particulate Matter (PM ₁₀)		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)	16.15	70.73
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	0.40	1.75
Phenol	0.034	0.15
Methanol	5.04	22.12
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.). Borden's Sealed Caul Plate Test Data (1995)		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

- 1) Requirement: 45CSR§30-12.7. Permit Condition: 3.1.21.
- 2) Requirement: 45CSR§30-12.7. Permit Condition: 3.1.24.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- 1) Recordkeeping - Permit Condition: 3.1.21.
- 2) Limit on Operation/Recordkeeping - Permit Conditions: 3.1.26., 3.4.6.

Are you in compliance with all applicable requirements for this emission unit? X Yes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 004-02	Emission unit name: MlamReman1	List any control devices associated with this emission unit: BGHS4
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):

MlamReman1 - Side trim hogs, billet cut off saws, and reman hog
 Microllam reman is used for finishing of the Microllam (LVL) product for shipping.

Manufacturer: USNR	Model number: N/A	Serial number: N/A
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Construction date: 05/01/1995	Installation date: 05/01/1995	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
 N/A

Maximum Hourly Throughput: N/A	Maximum Annual Throughput: N/A	Maximum Operating Schedule: 8760 hr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <u>X</u> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
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Maximum design heat input and/or maximum horsepower rating:	Type and Btu/hr rating of burners:
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})	0.084	0.367
Particulate Matter (PM ₁₀)	0.333	1.46
Total Particulate Matter (TSP)	1.71	7.49
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.). A factor of 0.005 gr/dscf was applied to the manufactures designed flow rate for BGHS4 to calculate PM emissions. (Emission factor derived from source testing performed at the Deerwood plant)		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

- 1) Requirement: 45CSR§7-3.1., 45CSR13, R13-1843B§B.4. Permit Condition: 3.1.10.
- 2) Requirement: 45CSR§7-4.1., 45CSR13, R13-1843B§B.4. Permit Condition: 3.1.13.
- 3) Requirement: 45CSR13, R13-1843B§A.11. Permit Condition: 3.1.23.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- 1) Monitoring(Visible Emission Tests)/Recordkeeping - Permit Conditions: 3.2.2., 3.2.3.
- 2) Recordkeeping - Permit Condition: 3.3.3.
- 3) Testing/Reporting - Permit Condition: 3.3.3.

Are you in compliance with all applicable requirements for this emission unit? X Yes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 004-03	Emission unit name: MlamReman2	List any control devices associated with this emission unit: BGHS3
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):

MlamReman2 - Rip saw, bundle cut saws and trim saws
 Microllam reman is used for finishing of the Microllam (LVL) product for shipping.

Manufacturer: USNR	Model number: N/A	Serial number: N/A
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Construction date: 05/01/1995	Installation date: 05/01/1995	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
 N/A

Maximum Hourly Throughput: N/A	Maximum Annual Throughput: N/A	Maximum Operating Schedule: 8760 hr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <u>X</u> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
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Maximum design heat input and/or maximum horsepower rating:	Type and Btu/hr rating of burners:
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})	0.056	0.245
Particulate Matter (PM ₁₀)	0.222	0.973
Total Particulate Matter (TSP)	1.14	4.99
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>A factor of 0.005 gr/dscf was applied to the manufactures designed flow rate for BGHS3 to calculate PM emissions. (Emission factor derived from source testing performed at the Deerwood plant)</p>		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

- 1) Requirement: 45CSR§7-3.1., 45CSR13, R13-1843B§B.4. Permit Condition: 3.1.10.
- 2) Requirement: 45CSR§7-4.1., 45CSR13, R13-1843B§B.4. Permit Condition: 3.1.13.
- 3) Requirement: 45CSR13, R13-1843B§A.11. Permit Condition: 3.1.23.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- 1) Monitoring(Visible Emission Tests)/Recordkeeping - Permit Conditions: 3.2.2., 3.2.3.
- 2) Recordkeeping - Permit Condition: 3.3.3.
- 3) Testing/Reporting - Permit Condition: 3.3.3.

Are you in compliance with all applicable requirements for this emission unit? X Yes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 004-04	Emission unit name: MlamTanks	List any control devices associated with this emission unit:
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Two (2) identical tanks that store resin.

Manufacturer: Ralph Jackson	Model number: N/A	Serial number: N/A
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Construction date: 05/01/1995	Installation date: 05/01/1995	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 10,000 gallons (each)

Maximum Hourly Throughput: 2,018.3 lb/hr	Maximum Annual Throughput: 8,840 tons	Maximum Operating Schedule: 8760 hr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <u>X</u> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
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Maximum design heat input and/or maximum horsepower rating:	Type and Btu/hr rating of burners:
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})		
Particulate Matter (PM ₁₀)		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Methanol	0.00468	0.0205
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.). EPA TANKS Software		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

- 1) Requirement: 40 C.F.R. § 60.116b (a) Permit Condition: 3.4.4.
- 2) Requirement: 40 C.F.R. § 60.116b (b) Permit Condition: 3.4.5.
- 2) Requirement: 45CSR§27-10.4., 45CSR13, R13-1843B§B.7. Permit Condition: 3.5.10.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- 1) Recordkeeping - Permit Condition: 3.4.4.
- 2) Recordkeeping - Permit Condition: 3.4.5.
- 3) Calculations/Reporting - Permit Condition: 3.5.10.

Are you in compliance with all applicable requirements for this emission unit? X Yes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

rsATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 004-05	Emission unit name: DrySilo	List any control devices associated with this emission unit: BGHS5
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Dry Fuel Silo is used for the storage of dry sawdust material.
 This silo may either unload to the furnace, to be mixed with green fuel,
 or into a hauling trailer.

Manufacturer: Laidig, Inc.	Model number: Super 243 (Unloader Model)	Serial number: 174S243
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Construction date: 05/01/1995	Installation date: 05/01/1995	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
 26,239 cuft

Maximum Hourly Throughput:	Maximum Annual Throughput:	Maximum Operating Schedule: 8760 hr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <u>X</u> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
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Maximum design heat input and/or maximum horsepower rating:	Type and Btu/hr rating of burners:
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})	0.009	0.0407
Particulate Matter (PM ₁₀)	0.0371	0.162
Total Particulate Matter (TSP)	0.19	0.83
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>A factor of 0.005 gr/dscf was applied to the manufactures designed flow rate for BGHS5 to calculate PM emissions. (Emission factor derived from source testing performed at the Deerwood Plant)</p>		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

- 1) Requirement: 45CSR§7-3.7. Permit Condition: 3.1.12.
- 2) Requirement: 45CSR13, R13-1843B§A.11. Permit Condition: 3.1.23.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- 1) Visible Emission Tests/Recordkeeping/Equipment Constraints - Permit Conditions: 3.1.30., 3.2.2., 3.2.3.
- 2) Testing/Reporting - Permit Condition: 3.3.3.

Are you in compliance with all applicable requirements for this emission unit? X Yes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 004-06	Emission unit name: MlamBooth	List any control devices associated with this emission unit:
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Designed to efficiently apply water based sealer to the ends and sides of LVL stacks by using advanced air gun technology.

A state-of-the-art, air filtration system brings air in through the top of the booth, creating a down draft that will carry overspray down through two stages of filters into tunnels built under the booth, and then through a final filter where it exits back to mill.

Manufacturer: WVCO Precision Technologies	Model number: Job #02-04-36	Serial number: N/A
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Construction date: 01/01/2003	Installation date: 01/01/2003	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons):

Stack Width of 5 1/2" to 24"

Stack Height of 10 1/2" to 12 1/4"

Maximum Hourly Throughput: 13.7 gal/hr	Maximum Annual Throughput: 120,000 gallons	Maximum Operating Schedule: 8760 hr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <u>X</u> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
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Maximum design heat input and/or maximum horsepower rating:	Type and Btu/hr rating of burners:
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})		
Particulate Matter (PM ₁₀)		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)	2.0	5.0
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

- 1) Requirement: 45CSR§30-12.7. Permit Condition: 3.1.32.
- 2) Requirement: 45CSR§30-12.7. Permit Condition: 3.1.33.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- 1) Limit on Operation/Recordkeeping - Permit Conditions: 3.2.4., 3.4.7.
- 2) Limit on Operation/Recordkeeping - Permit Conditions: 3.2.4., 3.4.7.

Are you in compliance with all applicable requirements for this emission unit? X Yes ___ No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 004-07	Emission unit name: Chip Bin	List any control devices associated with this emission unit:
---	--	---

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Chip bin is used for storage of green, wet wood chips.

Manufacturer: Clarke's Allied, Inc.	Model number: 68 Unit	Serial number: 95127
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Construction date: 05/01/1995	Installation date: 05/01/1995	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 6.77 tons/hr
13,600 cuft

Maximum Hourly Throughput: 6.77 tons/hr	Maximum Annual Throughput: 59,305 tons	Maximum Operating Schedule: 8760 hr
---	--	---

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <u>X</u> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
--	---

Maximum design heat input and/or maximum horsepower rating:	Type and Btu/hr rating of burners:
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})	0.033	0.1445
Particulate Matter (PM ₁₀)	0.2234	0.9785
Total Particulate Matter (TSP)	0.4874	2.135
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>AP-42 Bin Loading and Unloading (green or coarse wood waste)</p>		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

1) Requirement: 45CSR§7-3.7. Permit Condition: 3.1.12.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (*Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.*)

1) Visible Emission Tests/Recordkeeping/Equipment Constraints - Permit Conditions: 3.1.30., 3.2.1.

Are you in compliance with all applicable requirements for this emission unit? X Yes ___ No

If no, complete the **Schedule of Compliance Form** as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 004-08	Emission unit name: Fuel House	List any control devices associated with this emission unit:
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Fuel house is used for the storage of wood fuel.
Deisgned by Mid-South and constructed by Pierce Construction.

Manufacturer: Pierce Construction	Model number: N/A	Serial number: N/A
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Construction date: 05/01/1995	Installation date: 05/01/1995	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 8 tons/hr
96,000 cuft

Maximum Hourly Throughput: 8 tons/hr	Maximum Annual Throughput: 70,080 tons	Maximum Operating Schedule: 8760 hr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <u>X</u> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
--	---

Maximum design heat input and/or maximum horsepower rating:	Type and Btu/hr rating of burners:
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})	0.02	0.086
Particulate Matter (PM ₁₀)	0.133	0.582
Total Particulate Matter (TSP)	0.29	1.27
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>AP-42 Bin Loading and Unloading (green or coarse wood waste)</p>		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

1) Requirement: 45CSR§7-3.7. Permit Condition: 3.1.12.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (*Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.*)

1) Visible Emission Tests/Recordkeeping/Equipment Constraints - Permit Conditions: 3.1.30., 3.2.1.

Are you in compliance with all applicable requirements for this emission unit? X Yes ___ No

If no, complete the **Schedule of Compliance Form** as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 005-01	Emission unit name: PlamPress	List any control devices associated with this emission unit:
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Parallam press performs the pressing operation to produce Parallam (PSL) product.

Manufacturer: Kusters	Model number: Parallam Press #3	Serial number: N/A
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Construction date: 05/01/1995	Installation date: 05/01/1995	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
456 cuft/hr

Maximum Hourly Throughput: 685 cuft/hr	Maximum Annual Throughput: 6,000,000 cuft	Maximum Operating Schedule: 8760 hr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <u>X</u> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
--	---

Maximum design heat input and/or maximum horsepower rating:	Type and Btu/hr rating of burners:
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})		
Particulate Matter (PM ₁₀)		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)	11.86	51.97
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	1.15	5.04
Phenol	0.05	0.22
Methanol	7.42	32.5
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.). Neste's Sealed Caul Plate Test Data (1995)		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

- 1) Requirement: 45CSR§30-12.7. Permit Condition: 3.1.21.
- 2) Requirement: 45CSR§30-12.7. Permit Condition: 3.1.24.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- 1) Recordkeeping - Permit Condition: 3.1.21.
- 2) Limit on Operation/Recordkeeping - Permit Conditions: 3.1.27., 3.4.6.

Are you in compliance with all applicable requirements for this emission unit? X Yes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 005-03	Emission unit name: PlamLayup	List any control devices associated with this emission unit: BGHS1
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):
 PlamLayup - Rotary stranders, short strand hogs and billet cut-off saw

Manufacturer: Durand Raute, Blacks Brothers	Model number: N/A	Serial number: N/A
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Construction date: 05/01/1995	Installation date: 05/01/1995	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
 N/A

Maximum Hourly Throughput: N/A	Maximum Annual Throughput: N/A	Maximum Operating Schedule: 8760 hr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <u>X</u> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
--	---

Maximum design heat input and/or maximum horsepower rating:	Type and Btu/hr rating of burners:
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})	0.118	0.515
Particulate Matter (PM ₁₀)	0.468	2.05
Total Particulate Matter (TSP)	2.4	10.51
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.). A factor of 0.005 gr/dscf was applied to the manufactures designed flow rate for BGHS1 to calculate PM emissions. (Emission factor derived from source testing performed at the Deerwood plant)		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

- 1) Requirement: 45CSR§7-3.1., 45CSR13, R13-1843B§B.4. Permit Condition: 3.1.10.
- 2) Requirement: 45CSR§7-4.1., 45CSR13, R13-1843B§B.4. Permit Condition: 3.1.13.
- 3) Requirement: 45CSR13, R13-1843B§A.11. Permit Condition: 3.1.23.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- 1) Monitoring(Visible Emission Tests)/Recordkeeping - Permit Conditions: 3.2.2., 3.2.3.
- 2) Recordkeeping - Permit Condition: 3.3.3.
- 3) Testing/Reporting - Permit Condition: 3.3.3.

Are you in compliance with all applicable requirements for this emission unit? X Yes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 005-04	Emission unit name: PlamReman1	List any control devices associated with this emission unit: BGHS2A
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):

PlamReman1 - Billet reject saw, sizer, package saw and defect saw
 Parallam reman is used to finish the Parallam (PSL) product for shipping.

Manufacturer: USNR	Model number: N/A	Serial number: N/A
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Construction date: 05/01/1995	Installation date: 05/01/1995	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
 N/A

Maximum Hourly Throughput: N/A	Maximum Annual Throughput: N/A	Maximum Operating Schedule: 8760 hr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <u>X</u> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
--	---

Maximum design heat input and/or maximum horsepower rating:	Type and Btu/hr rating of burners:
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})	0.0936	0.41
Particulate Matter (PM ₁₀)	0.372	1.63
Total Particulate Matter (TSP)	1.91	8.37
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.). A factor of 0.005 gr/dscf was applied to the manufactures designed flow rate for BHGS2A to calculate PM emissions. (Emission factor derived from source testing performed at the Deerwood plant)		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

- 1) Requirement: 45CSR§7-3.1., 45CSR13, R13-1843B§B.4. Permit Condition: 3.1.10.
- 2) Requirement: 45CSR§7-4.1., 45CSR13, R13-1843B§B.4. Permit Condition: 3.1.13.
- 3) Requirement: 45CSR13, R13-1843B§A.11. Permit Condition: 3.1.23.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- 1) Monitoring(Visible Emission Tests)/Recordkeeping - Permit Conditions: 3.2.2., 3.2.3.
- 2) Recordkeeping - Permit Condition: 3.3.3.
- 3) Testing/Reporting - Permit Condition: 3.3.3.

Are you in compliance with all applicable requirements for this emission unit? X Yes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 005-05	Emission unit name: PlamReman2	List any control devices associated with this emission unit: BGHS2B
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):

PlamReman2 - Twin band saw and planer
Parallam reman is used to finish the Parallam (PSL) product for shipping.

Manufacturer: USNR	Model number: N/A	Serial number: N/A
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Construction date: 05/01/1995	Installation date: 05/01/1995	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
N/A

Maximum Hourly Throughput: N/A	Maximum Annual Throughput: N/A	Maximum Operating Schedule: 8760 hr
--	--	---

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <u>X</u> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
--	---

Maximum design heat input and/or maximum horsepower rating:	Type and Btu/hr rating of burners:
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})	0.107	0.468
Particulate Matter (PM ₁₀)	0.425	1.86
Total Particulate Matter (TSP)	2.18	9.55
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>A factor of 0.005 gr/dscf was applied to the manufactures designed flow rate for BHGS2B to calculate PM emissions. (Emission factor derived from source testing performed at the Deerwood plant)</p>		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

- 1) Requirement: 45CSR§7-3.1., 45CSR13, R13-1843B§B.4. Permit Condition: 3.1.10.
- 2) Requirement: 45CSR§7-4.1., 45CSR13, R13-1843B§B.4. Permit Condition: 3.1.13.
- 3) Requirement: 45CSR13, R13-1843B§A.11. Permit Condition: 3.1.23.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- 1) Monitoring(Visible Emission Tests)/Recordkeeping - Permit Conditions: 3.2.2., 3.2.3.
- 2) Recordkeeping - Permit Condition: 3.3.3.
- 3) Testing/Reporting - Permit Condition: 3.3.3.

Are you in compliance with all applicable requirements for this emission unit? X Yes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 005-06	Emission unit name: PlamTanks	List any control devices associated with this emission unit:
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Two (2) identical tanks that store resin.

Manufacturer: Ralph Jackson	Model number: N/A	Serial number: N/A
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Construction date: 05/01/1995	Installation date: 05/01/1995	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 15,000 gallons (each)

Maximum Hourly Throughput: 2,968 lbs/hr	Maximum Annual Throughput: 13,000 tons	Maximum Operating Schedule: 8760 hr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <u>X</u> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
--	---

Maximum design heat input and/or maximum horsepower rating:	Type and Btu/hr rating of burners:
--	---

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})		
Particulate Matter (PM ₁₀)		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Methanol	0.00766	0.0335
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>EPA TANKS Software</p>		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

- 1) Requirement: 40 C.F.R. § 60.116b (a) Permit Condition: 3.4.4.
- 2) Requirement: 40 C.F.R. § 60.116b (b) Permit Condition: 3.4.5.
- 3) Requirement: 45CSR§27-10.4., 45CSR13, R13-1843B§B.7. Permit Condition: 3.5.10.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- 1) Recordkeeping - Permit Condition: 3.4.4.
- 2) Recordkeeping - Permit Condition: 3.4.5.
- 3) Calculations/Reporting - Permit Condition: 3.5.10.

Are you in compliance with all applicable requirements for this emission unit? X Yes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 005-09	Emission unit name: Plam Sealer Booth	List any control devices associated with this emission unit: PM Filter Bank
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Designed to efficiently apply sealer to the parallam using advanced spray technology.

A state-of-the-art, air filtration system will bring air in through the inlet and outlet openings of the booth and direct emissions through high efficiency cartridge filters before exhausting outside the building through a common stack.

Manufacturer: Spray Systems	Model number: Custom	Serial number: N/A
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Construction date: 2/15/2016	Installation date: 4/15/2016	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons):

9.12 gallons/hr of sealer

Maximum Hourly Throughput: 9.12 gal/hr	Maximum Annual Throughput: 79,842 gallons/yr	Maximum Operating Schedule: 8760 hrs/yr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, is it? <input type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired
--	--

Maximum design heat input and/or maximum horsepower rating:	Type and Btu/hr rating of burners:
--	---

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY

Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})		
Particulate Matter (PM ₁₀)	28.00	122.64
Total Particulate Matter (TSP)	28.00	122.64
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
MDI	28	122.64
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.). Engineering Estimates based on the amount of material needed for a given sealer thickness (g/sq ft) on product. These estimates equate to 9.12gal/hr of sealer sprayed while maintaining a 70% transfer efficiency.		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

The spray booth is identified as an affected source under MACT Subpart DDDD for PCWP Manufacturing Sources. However, due to being classified as a sealer under miscellaneous coatings operations there are no specific control requirements prescribed.

The source plans to control the PM, HAP using highly efficient spray booth particulate filters. It is expected that under Rule 13 the production rate will be limited to that defined by the application and control equipment operating parameters such as pressure drop will be monitored to assure the maximum degree of control is maintained.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

The production rate of sealer sprayed will be monitored and limited to that defined by the application. Additionally, the key control equipment operating parameter, pressure drop, will be monitored to assure a maximum degree of control is maintained and an appropriate filter replacement schedule is adhered to.

Are you in compliance with all applicable requirements for this emission unit? X Yes ___ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**. Note this unit is proposed and has not yet been approved by R13-1849B which is undergoing review by the DAQ.

Attachment L EMISSIONS UNIT DATA SHEET STORAGE TANKS

Provide the following information for each new or modified bulk liquid storage tank as shown on the *Equipment List Form* and other parts of this application. A tank is considered modified if the material to be stored in the tank is different from the existing stored liquid.

IF USING US EPA'S TANKS EMISSION ESTIMATION PROGRAM (AVAILABLE AT www.epa.gov/tnn/tanks.html), APPLICANT MAY ATTACH THE SUMMARY SHEETS IN LIEU OF COMPLETING SECTIONS III, IV, & V OF THIS FORM. HOWEVER, SECTIONS I, II, AND VI OF THIS FORM MUST BE COMPLETED. US EPA'S AP-42, SECTION 7.1, "ORGANIC LIQUID STORAGE TANKS," MAY ALSO BE USED TO ESTIMATE VOC AND HAP EMISSIONS (<http://www.epa.gov/tnn/chief/>).

I. GENERAL INFORMATION (required)

1. Bulk Storage Area Name Plam Sealer Storage	2. Tank Name Bulk Sealer Tank
3. Tank Equipment Identification No. (as assigned on <i>Equipment List Form</i>) 005-07	4. Emission Point Identification No. (as assigned on <i>Equipment List Form</i>) Plam Sealer Tank
5. Date of Commencement of Construction (for existing tanks)	
6. Type of change <input checked="" type="checkbox"/> New Construction <input type="checkbox"/> New Stored Material <input type="checkbox"/> Other Tank Modification	
7. Description of Tank Modification (if applicable) Installation of a 6,000 gallon MDI Sealer bulk storage tank	
7A. Does the tank have more than one mode of operation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (e.g. Is there more than one product stored in the tank?)	
7B. If YES, explain and identify which mode is covered by this application (Note: A separate form must be completed for each mode).	
7C. Provide any limitations on source operation affecting emissions, any work practice standards (e.g. production variation, etc.): The tank will incorporate a dry air blanket with conservation venting at 20 psig.	

II. TANK INFORMATION (required)

8. Design Capacity (specify barrels or gallons). Use the internal cross-sectional area multiplied by internal height. <div style="text-align: center;">6,000 gallons</div>	
9A. Tank Internal Diameter (ft) <div style="text-align: center;">8</div>	9B. Tank Internal Height (or Length) (ft) <div style="text-align: center;">16</div>
10A. Maximum Liquid Height (ft) <div style="text-align: center;">15</div>	10B. Average Liquid Height (ft) <div style="text-align: center;">8</div>
11A. Maximum Vapor Space Height (ft) <div style="text-align: center;">15</div>	11B. Average Vapor Space Height (ft) <div style="text-align: center;">8</div>
12. Nominal Capacity (specify barrels or gallons). This is also known as "working volume" and considers design liquid levels and overflow valve heights. <div style="text-align: center;">6,000</div>	

13A. Maximum annual throughput (gal/yr) <div style="text-align: center;">79,842</div>	13B. Maximum daily throughput (gal/day) <div style="text-align: center;">218.74</div>
14. Number of Turnovers per year (annual net throughput/maximum tank liquid volume) <div style="text-align: center;">13.31</div>	
15. Maximum tank fill rate (gal/min)	
16. Tank fill method <input checked="" type="checkbox"/> Submerged <input type="checkbox"/> Splash <input type="checkbox"/> Bottom Loading	
17. Complete 17A and 17B for Variable Vapor Space Tank Systems <input checked="" type="checkbox"/> Does Not Apply	
17A. Volume Expansion Capacity of System (gal)	17B. Number of transfers into system per year
18. Type of tank (check all that apply): <input checked="" type="checkbox"/> Fixed Roof ___ vertical ___ horizontal ___ flat roof ___ cone roof ___ dome roof ___ other (describe) <input type="checkbox"/> External Floating Roof ___ pontoon roof ___ double deck roof <input type="checkbox"/> Domed External (or Covered) Floating Roof <input type="checkbox"/> Internal Floating Roof ___ vertical column support ___ self-supporting <input type="checkbox"/> Variable Vapor Space ___ lifter roof ___ diaphragm <input type="checkbox"/> Pressurized ___ spherical ___ cylindrical <input type="checkbox"/> Underground <input type="checkbox"/> Other (describe)	

III. TANK CONSTRUCTION & OPERATION INFORMATION (optional if providing TANKS Summary Sheets)

19. Tank Shell Construction: <input type="checkbox"/> Riveted <input type="checkbox"/> Gunitite lined <input type="checkbox"/> Epoxy-coated rivets <input checked="" type="checkbox"/> Other (describe) welded		
20A. Shell Color	20B. Roof Color	20C. Year Last Painted
21. Shell Condition (if metal and unlined): <input type="checkbox"/> No Rust <input type="checkbox"/> Light Rust <input type="checkbox"/> Dense Rust <input type="checkbox"/> Not applicable		
22A. Is the tank heated? <input type="checkbox"/> YES <input type="checkbox"/> NO		
22B. If YES, provide the operating temperature (°F)		
22C. If YES, please describe how heat is provided to tank.		
23. Operating Pressure Range (psig): 10 to 20		
24. Complete the following section for Vertical Fixed Roof Tanks <input type="checkbox"/> Does Not Apply		
24A. For dome roof, provide roof radius (ft)		
24B. For cone roof, provide slope (ft/ft)		
25. Complete the following section for Floating Roof Tanks <input type="checkbox"/> Does Not Apply		
25A. Year Internal Floaters Installed:		
25B. Primary Seal Type: <input type="checkbox"/> Metallic (Mechanical) Shoe Seal <input type="checkbox"/> Liquid Mounted Resilient Seal (check one) <input type="checkbox"/> Vapor Mounted Resilient Seal <input type="checkbox"/> Other (describe):		
25C. Is the Floating Roof equipped with a Secondary Seal? <input type="checkbox"/> YES <input type="checkbox"/> NO		
25D. If YES, how is the secondary seal mounted? (check one) <input type="checkbox"/> Shoe <input type="checkbox"/> Rim <input type="checkbox"/> Other (describe):		
25E. Is the Floating Roof equipped with a weather shield? <input type="checkbox"/> YES <input type="checkbox"/> NO		

25F. Describe deck fittings; indicate the number of each type of fitting:		
ACCESS HATCH		
BOLT COVER, GASKETED:	UNBOLTED COVER, GASKETED:	UNBOLTED COVER, UNGASKETED:
AUTOMATIC GAUGE FLOAT WELL		
BOLT COVER, GASKETED:	UNBOLTED COVER, GASKETED:	UNBOLTED COVER, UNGASKETED:
COLUMN WELL		
BUILT-UP COLUMN – SLIDING COVER, GASKETED:	BUILT-UP COLUMN – SLIDING COVER, UNGASKETED:	PIPE COLUMN – FLEXIBLE FABRIC SLEEVE SEAL:
LADDER WELL		
PIP COLUMN – SLIDING COVER, GASKETED:	PIPE COLUMN – SLIDING COVER, UNGASKETED:	
GAUGE-HATCH/SAMPLE PORT		
SLIDING COVER, GASKETED:	SLIDING COVER, UNGASKETED:	
ROOF LEG OR HANGER WELL		
WEIGHTED MECHANICAL ACTUATION, GASKETED:	WEIGHTED MECHANICAL ACTUATION, UNGASKETED:	SAMPLE WELL-SLIT FABRIC SEAL (10% OPEN AREA)
VACUUM BREAKER		
WEIGHTED MECHANICAL ACTUATION, GASKETED:	WEIGHTED MECHANICAL ACTUATION, UNGASKETED:	
RIM VENT		
WEIGHTED MECHANICAL ACTUATION GASKETED:	WEIGHTED MECHANICAL ACTUATION, UNGASKETED:	
DECK DRAIN (3-INCH DIAMETER)		
OPEN:	90% CLOSED:	
STUB DRAIN		
1-INCH DIAMETER:		
OTHER (DESCRIBE, ATTACH ADDITIONAL PAGES IF NECESSARY)		

26. Complete the following section for Internal Floating Roof Tanks <input type="checkbox"/> Does Not Apply	
26A. Deck Type: <input type="checkbox"/> Bolted <input type="checkbox"/> Welded	
26B. For Bolted decks, provide deck construction:	
26C. Deck seam: <input type="checkbox"/> Continuous sheet construction 5 feet wide <input type="checkbox"/> Continuous sheet construction 6 feet wide <input type="checkbox"/> Continuous sheet construction 7 feet wide <input type="checkbox"/> Continuous sheet construction 5 × 7.5 feet wide <input type="checkbox"/> Continuous sheet construction 5 × 12 feet wide <input type="checkbox"/> Other (describe)	
26D. Deck seam length (ft)	26E. Area of deck (ft ²)
For column supported tanks:	26G. Diameter of each column:
26F. Number of columns:	

IV. SITE INFORMATION (optional if providing TANKS Summary Sheets)

27. Provide the city and state on which the data in this section are based.
28. Daily Average Ambient Temperature (°F)
29. Annual Average Maximum Temperature (°F)
30. Annual Average Minimum Temperature (°F)
31. Average Wind Speed (miles/hr)
32. Annual Average Solar Insulation Factor (BTU/(ft ² ·day))
33. Atmospheric Pressure (psia)

V. LIQUID INFORMATION (optional if providing TANKS Summary Sheets)

34. Average daily temperature range of bulk liquid: See TANKS Summary Sheets			
34A. Minimum (°F)		34B. Maximum (°F)	
35. Average operating pressure range of tank:			
35A. Minimum (psig)		35B. Maximum (psig)	
36A. Minimum Liquid Surface Temperature (°F)		36B. Corresponding Vapor Pressure (psia)	
37A. Average Liquid Surface Temperature (°F)		37B. Corresponding Vapor Pressure (psia)	
38A. Maximum Liquid Surface Temperature (°F)		38B. Corresponding Vapor Pressure (psia)	
39. Provide the following for <u>each</u> liquid or gas to be stored in tank. Add additional pages if necessary.			
39A. Material Name or Composition			
39B. CAS Number			
39C. Liquid Density (lb/gal)			
39D. Liquid Molecular Weight (lb/lb-mole)			
39E. Vapor Molecular Weight (lb/lb-mole)			

Maximum Vapor Pressure 39F. True (psia)			
39G. Reid (psia)			
Months Storage per Year 39H. From			
39I. To			

VI. EMISSIONS AND CONTROL DEVICE DATA (required)

40. Emission Control Devices (check as many as apply): ☐ Does Not Apply

☐ Carbon Adsorption¹

☐ Condenser¹

☒ Conservation Vent (psig)

Vacuum Setting

Pressure Setting 20 psig

☐ Emergency Relief Valve (psig)

☐ Inert Gas Blanket of

☐ Insulation of Tank with

☐ Liquid Absorption (scrubber)¹

☐ Refrigeration of Tank

☐ Rupture Disc (psig)

☐ Vent to Incinerator¹

☐ Other¹ (describe):

¹ Complete appropriate Air Pollution Control Device Sheet.

41. Expected Emission Rate (submit Test Data or Calculations here or elsewhere in the application).

Material Name & CAS No.	Breathing Loss (lb/hr)	Working Loss		Annual Loss (lb/yr)	Estimation Method ¹
		Amount	Units		
MDI (101-68-8)					

¹ EPA = EPA Emission Factor, MB = Material Balance, SS = Similar Source, ST = Similar Source Test, Throughput Data, O = Other (specify)

☐ Remember to attach emissions calculations, including TANKS Summary Sheets if applicable.

Attachment L EMISSIONS UNIT DATA SHEET STORAGE TANKS

Provide the following information for each new or modified bulk liquid storage tank as shown on the *Equipment List Form* and other parts of this application. A tank is considered modified if the material to be stored in the tank is different from the existing stored liquid.

IF USING US EPA'S TANKS EMISSION ESTIMATION PROGRAM (AVAILABLE AT www.epa.gov/tnn/tanks.html), APPLICANT MAY ATTACH THE SUMMARY SHEETS IN LIEU OF COMPLETING SECTIONS III, IV, & V OF THIS FORM. HOWEVER, SECTIONS I, II, AND VI OF THIS FORM MUST BE COMPLETED. US EPA'S AP-42, SECTION 7.1, "ORGANIC LIQUID STORAGE TANKS," MAY ALSO BE USED TO ESTIMATE VOC AND HAP EMISSIONS (<http://www.epa.gov/tnn/chief/>).

I. GENERAL INFORMATION (required)

1. Bulk Storage Area Name Plam Sealer Day Tanks	2. Tank Name Sealer Day/Mix Tank
3. Tank Equipment Identification No. (as assigned on <i>Equipment List Form</i>) 005-08	4. Emission Point Identification No. (as assigned on <i>Equipment List Form</i>) PLAMSEALERDAY
5. Date of Commencement of Construction (for existing tanks)	
6. Type of change <input checked="" type="checkbox"/> New Construction <input type="checkbox"/> New Stored Material <input type="checkbox"/> Other Tank Modification	
7. Description of Tank Modification (if applicable) Installation of a 350 gallon MDI Sealer day/mix tank	
7A. Does the tank have more than one mode of operation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (e.g. Is there more than one product stored in the tank?)	
7B. If YES, explain and identify which mode is covered by this application (Note: A separate form must be completed for each mode).	
7C. Provide any limitations on source operation affecting emissions, any work practice standards (e.g. production variation, etc.): The tank will incorporate a dry air blanket with conservation venting at 20 psig.	

II. TANK INFORMATION (required)

8. Design Capacity (specify barrels or gallons). Use the internal cross-sectional area multiplied by internal height. <div style="text-align: right; margin-right: 50px;">350 gallons</div>	
9A. Tank Internal Diameter (ft) <div style="text-align: center;">3.1</div>	9B. Tank Internal Height (or Length) (ft) <div style="text-align: center;">6.2</div>
10A. Maximum Liquid Height (ft) <div style="text-align: center;">6.0</div>	10B. Average Liquid Height (ft) <div style="text-align: center;">3.5</div>
11A. Maximum Vapor Space Height (ft) <div style="text-align: center;">3</div>	11B. Average Vapor Space Height (ft) <div style="text-align: center;">2</div>
12. Nominal Capacity (specify barrels or gallons). This is also known as "working volume" and considers design liquid levels and overflow valve heights. <div style="text-align: right; margin-right: 50px;">350</div>	

I. TANK CONSTRUCTION & OPERATION INFORMATION (optional if providing TANKS Summary Sheets)

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25F. Describe deck fittings; indicate the number of each type of fitting:		
ACCESS HATCH		
BOLT COVER, GASKETED:	UNBOLTED COVER, GASKETED:	UNBOLTED COVER, UNGASKETED:
AUTOMATIC GAUGE FLOAT WELL		
BOLT COVER, GASKETED:	UNBOLTED COVER, GASKETED:	UNBOLTED COVER, UNGASKETED:
COLUMN WELL		
BUILT-UP COLUMN – SLIDING COVER, GASKETED:	BUILT-UP COLUMN – SLIDING COVER, UNGASKETED:	PIPE COLUMN – FLEXIBLE FABRIC SLEEVE SEAL:
LADDER WELL		
PIP COLUMN – SLIDING COVER, GASKETED:	PIPE COLUMN – SLIDING COVER, UNGASKETED:	
GAUGE-HATCH/SAMPLE PORT		
SLIDING COVER, GASKETED:	SLIDING COVER, UNGASKETED:	
ROOF LEG OR HANGER WELL		
WEIGHTED MECHANICAL ACTUATION, GASKETED:	WEIGHTED MECHANICAL ACTUATION, UNGASKETED:	SAMPLE WELL-SLIT FABRIC SEAL (10% OPEN AREA)
VACUUM BREAKER		
WEIGHTED MECHANICAL ACTUATION, GASKETED:	WEIGHTED MECHANICAL ACTUATION, UNGASKETED:	
RIM VENT		
WEIGHTED MECHANICAL ACTUATION GASKETED:	WEIGHTED MECHANICAL ACTUATION, UNGASKETED:	
DECK DRAIN (3-INCH DIAMETER)		
OPEN:	90% CLOSED:	
STUB DRAIN		
1-INCH DIAMETER:		
OTHER (DESCRIBE, ATTACH ADDITIONAL PAGES IF NECESSARY)		

26. Complete the following section for Internal Floating Roof Tanks <input type="checkbox"/> Does Not Apply	
26A. Deck Type: <input type="checkbox"/> Bolted <input type="checkbox"/> Welded	
26B. For Bolted decks, provide deck construction:	
26C. Deck seam: <input type="checkbox"/> Continuous sheet construction 5 feet wide <input type="checkbox"/> Continuous sheet construction 6 feet wide <input type="checkbox"/> Continuous sheet construction 7 feet wide <input type="checkbox"/> Continuous sheet construction 5 × 7.5 feet wide <input type="checkbox"/> Continuous sheet construction 5 × 12 feet wide <input type="checkbox"/> Other (describe)	
26D. Deck seam length (ft)	26E. Area of deck (ft ²)
For column supported tanks:	26G. Diameter of each column:
26F. Number of columns:	

IV. SITE INFORMATION (optional if providing TANKS Summary Sheets)

27. Provide the city and state on which the data in this section are based. See TANKS Summary Sheets
28. Daily Average Ambient Temperature (°F)
29. Annual Average Maximum Temperature (°F)
30. Annual Average Minimum Temperature (°F)
31. Average Wind Speed (miles/hr)
32. Annual Average Solar Insulation Factor (BTU/(ft ² ·day))
33. Atmospheric Pressure (psia)

V. LIQUID INFORMATION (optional if providing TANKS Summary Sheets)

34. Average daily temperature range of bulk liquid: See TANKS Summary Sheets			
34A. Minimum (°F)		34B. Maximum (°F)	
35. Average operating pressure range of tank:			
35A. Minimum (psig)		35B. Maximum (psig)	
36A. Minimum Liquid Surface Temperature (°F)		36B. Corresponding Vapor Pressure (psia)	
37A. Average Liquid Surface Temperature (°F)		37B. Corresponding Vapor Pressure (psia)	
38A. Maximum Liquid Surface Temperature (°F)		38B. Corresponding Vapor Pressure (psia)	
39. Provide the following for <u>each</u> liquid or gas to be stored in tank. Add additional pages if necessary.			
39A. Material Name or Composition			
39B. CAS Number			
39C. Liquid Density (lb/gal)			
39D. Liquid Molecular Weight (lb/lb-mole)			
39E. Vapor Molecular Weight (lb/lb-mole)			

Maximum Vapor Pressure 39F. True (psia)			
39G. Reid (psia)			
Months Storage per Year 39H. From			
39I. To			

VI. EMISSIONS AND CONTROL DEVICE DATA (required)

40. Emission Control Devices (check as many as apply): ☒ Does Not Apply

☐ Carbon Adsorption¹

☐ Condenser¹

☒ Conservation Vent (psig)

Vacuum Setting

Pressure Setting 20 psig

☐ Emergency Relief Valve (psig)

☐ Inert Gas Blanket of

☐ Insulation of Tank with

☐ Liquid Absorption (scrubber)¹

☐ Refrigeration of Tank

☐ Rupture Disc (psig)

☐ Vent to Incinerator¹

☐ Other¹ (describe):

¹ Complete appropriate Air Pollution Control Device Sheet.

41. Expected Emission Rate (submit Test Data or Calculations here or elsewhere in the application).

Material Name & CAS No.	Breathing Loss (lb/hr)	Working Loss		Annual Loss (lb/yr)	Estimation Method ¹
		Amount	Units		
MDI (101-68-8)					

¹ EPA = EPA Emission Factor, MB = Material Balance, SS = Similar Source, ST = Similar Source Test, Throughput Data, O = Other (specify)

☐ Remember to attach emissions calculations, including TANKS Summary Sheets if applicable.

ATTACHMENT G

AIR POLLUTION CONTROL DEVICE FORMS

Title V Renewal Application

Buckhannon Facility, 097-00029
Buckhannon, West Virginia

Weyerhaeuser NR Company
41 TJM Drive
Buckhannon, West Virginia

September 2015

ATTACHMENT G - Air Pollution Control Device Form		
Control device ID number: BGHS1	List all emission units associated with this control device. PlamLayup - Rotary stranders, short strands hogs, and billet cut-off saw	
Manufacturer: MAC Environmental	Model number: 144MCF572	Installation date: 05/01/1995
Type of Air Pollution Control Device:		
<div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"><input checked="" type="checkbox"/> Baghouse/Fabric Filter</div> <div style="width: 33%;"><input type="checkbox"/> Venturi Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Multiclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Bed Adsorber</div> <div style="width: 33%;"><input type="checkbox"/> Packed Tower Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Single Cyclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Drum(s)</div> <div style="width: 33%;"><input type="checkbox"/> Other Wet Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Cyclone Bank</div> <div style="width: 33%;"><input type="checkbox"/> Catalytic Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Condenser</div> <div style="width: 33%;"><input type="checkbox"/> Settling Chamber</div> <div style="width: 33%;"><input type="checkbox"/> Thermal Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Flare</div> <div style="width: 33%;"><input type="checkbox"/> Other (describe) _____</div> <div style="width: 33%;"><input type="checkbox"/> Wet Plate Electrostatic Precipitator</div> <div style="width: 33%;"><input type="checkbox"/> Dry Plate Electrostatic Precipitator</div> </div>		
List the pollutants for which this device is intended to control and the capture and control efficiencies.		
Pollutant	Capture Efficiency	Control Efficiency
Particulate Matter	100%	99%
Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.). Design Flow Rate = 56,000 CFM Number of Bags = 572		
Is this device subject to the CAM requirements of 40 C.F.R. 64? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Complete ATTACHMENT H If No, Provide justification.		
Describe the parameters monitored and/or methods used to indicate performance of this control device. Daily inspection to insure proper operation (Differential pressure check) Broken bag detectors.		

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number:
BGHS2A

List all emission units associated with this control device.
PlamReman1 - Billet reject saw, sizer, package saw and defect saw)

Manufacturer:
MAC Environmental

Model number:
144MCF494

Installation date:
05/01/1995

Type of Air Pollution Control Device:

☒ **Baghouse/Fabric Filter** ☐ Venturi Scrubber ☐ Multiclone
☐ Carbon Bed Adsorber ☐ Packed Tower Scrubber ☐ Single Cyclone
☐ Carbon Drum(s) ☐ Other Wet Scrubber ☐ Cyclone Bank
☐ Catalytic Incinerator ☐ Condenser ☐ Settling Chamber
☐ Thermal Incinerator ☐ Flare ☐ Other (describe) _____
☐ Wet Plate Electrostatic Precipitator ☐ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
Particulate Matter	100%	99%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Design Flow Rate = 44,700 CFM
Number of Bags = 494

Is this device subject to the CAM requirements of 40 C.F.R. 64? ☐ Yes ☒ No

If Yes, **Complete ATTACHMENT H**

If No, **Provide justification.**

Describe the parameters monitored and/or methods used to indicate performance of this control device.

Daily inspection to insure proper operation (Differential pressure check)
Broken bag detectors.

ATTACHMENT G - Air Pollution Control Device Form		
Control device ID number: BGHS2B	List all emission units associated with this control device. PlamReman2 - Twin band saw and planer	
Manufacturer: MAC Environmental	Model number: 144MCF494	Installation date: 05/01/1995
Type of Air Pollution Control Device:		
<div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"><input checked="" type="checkbox"/> Baghouse/Fabric Filter</div> <div style="width: 33%;"><input type="checkbox"/> Venturi Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Multiclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Bed Adsorber</div> <div style="width: 33%;"><input type="checkbox"/> Packed Tower Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Single Cyclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Drum(s)</div> <div style="width: 33%;"><input type="checkbox"/> Other Wet Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Cyclone Bank</div> <div style="width: 33%;"><input type="checkbox"/> Catalytic Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Condenser</div> <div style="width: 33%;"><input type="checkbox"/> Settling Chamber</div> <div style="width: 33%;"><input type="checkbox"/> Thermal Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Flare</div> <div style="width: 33%;"><input type="checkbox"/> Other (describe) _____</div> <div style="width: 33%;"><input type="checkbox"/> Wet Plate Electrostatic Precipitator</div> <div style="width: 33%;"><input type="checkbox"/> Dry Plate Electrostatic Precipitator</div> </div>		
List the pollutants for which this device is intended to control and the capture and control efficiencies.		
Pollutant	Capture Efficiency	Control Efficiency
Particulate Matter	100%	99%
Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.). Design Flow Rate = 50,900 CFM Number of Bags = 494		
Is this device subject to the CAM requirements of 40 C.F.R. 64? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Complete ATTACHMENT H If No, Provide justification.		
Describe the parameters monitored and/or methods used to indicate performance of this control device. Daily inspection to insure proper operation (Differential pressure check) Broken bag detectors.		

ATTACHMENT G - Air Pollution Control Device Form		
Control device ID number: BGHS3	List all emission units associated with this control device. MlamReman2 - Rip saw, bundle cut saws, and trim saws	
Manufacturer: MAC Environmental	Model number: 144MCF255	Installation date: 05/01/1995
Type of Air Pollution Control Device:		
<div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"><input checked="" type="checkbox"/> Baghouse/Fabric Filter</div> <div style="width: 33%;"><input type="checkbox"/> Venturi Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Multiclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Bed Adsorber</div> <div style="width: 33%;"><input type="checkbox"/> Packed Tower Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Single Cyclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Drum(s)</div> <div style="width: 33%;"><input type="checkbox"/> Other Wet Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Cyclone Bank</div> <div style="width: 33%;"><input type="checkbox"/> Catalytic Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Condenser</div> <div style="width: 33%;"><input type="checkbox"/> Settling Chamber</div> <div style="width: 33%;"><input type="checkbox"/> Thermal Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Flare</div> <div style="width: 33%;"><input type="checkbox"/> Other (describe) _____</div> <div style="width: 33%;"><input type="checkbox"/> Wet Plate Electrostatic Precipitator</div> <div style="width: 33%;"><input type="checkbox"/> Dry Plate Electrostatic Precipitator</div> </div>		
List the pollutants for which this device is intended to control and the capture and control efficiencies.		
Pollutant	Capture Efficiency	Control Efficiency
Particulate Matter	100%	99%
Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.). Design Flow Rate = 26,700 CFM Number of Bags = 255		
Is this device subject to the CAM requirements of 40 C.F.R. 64? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Complete ATTACHMENT H If No, Provide justification.		
Describe the parameters monitored and/or methods used to indicate performance of this control device. Daily inspection to insure proper operation (Differential pressure check) Broken bag detectors.		

ATTACHMENT G - Air Pollution Control Device Form		
Control device ID number: BGHS4	List all emission units associated with this control device. MlamReman1 - Side trim hogs, billet cut-off saws, and reman hogger	
Manufacturer: MAC Environmental	Model number: 144MCF416	Installation date: 05/01/1995
Type of Air Pollution Control Device:		
<div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"><input checked="" type="checkbox"/> Baghouse/Fabric Filter</div> <div style="width: 33%;"><input type="checkbox"/> Venturi Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Multiclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Bed Adsorber</div> <div style="width: 33%;"><input type="checkbox"/> Packed Tower Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Single Cyclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Drum(s)</div> <div style="width: 33%;"><input type="checkbox"/> Other Wet Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Cyclone Bank</div> <div style="width: 33%;"><input type="checkbox"/> Catalytic Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Condenser</div> <div style="width: 33%;"><input type="checkbox"/> Settling Chamber</div> <div style="width: 33%;"><input type="checkbox"/> Thermal Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Flare</div> <div style="width: 33%;"><input type="checkbox"/> Other (describe) _____</div> <div style="width: 33%;"><input type="checkbox"/> Wet Plate Electrostatic Precipitator</div> <div style="width: 33%;"><input type="checkbox"/> Dry Plate Electrostatic Precipitator</div> </div>		
List the pollutants for which this device is intended to control and the capture and control efficiencies.		
Pollutant	Capture Efficiency	Control Efficiency
Particulate Matter	100%	99%
Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.). Design Flow Rate = 40,000 CFM Number of Bags = 416		
Is this device subject to the CAM requirements of 40 C.F.R. 64? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Complete ATTACHMENT H If No, Provide justification.		
Describe the parameters monitored and/or methods used to indicate performance of this control device. Daily inspection to insure proper operation (Differential pressure check) Broken bag detectors.		

ATTACHMENT G - Air Pollution Control Device Form		
Control device ID number: BGHS5	List all emission units associated with this control device. DrySilo	
Manufacturer: MAC Environmental	Model number: 144MCF88	Installation date: 05/01/1995
Type of Air Pollution Control Device:		
<div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"><input checked="" type="checkbox"/> Baghouse/Fabric Filter</div> <div style="width: 33%;"><input type="checkbox"/> Venturi Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Multiclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Bed Adsorber</div> <div style="width: 33%;"><input type="checkbox"/> Packed Tower Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Single Cyclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Drum(s)</div> <div style="width: 33%;"><input type="checkbox"/> Other Wet Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Cyclone Bank</div> <div style="width: 33%;"><input type="checkbox"/> Catalytic Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Condenser</div> <div style="width: 33%;"><input type="checkbox"/> Settling Chamber</div> <div style="width: 33%;"><input type="checkbox"/> Thermal Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Flare</div> <div style="width: 33%;"><input type="checkbox"/> Other (describe) _____</div> <div style="width: 33%;"><input type="checkbox"/> Wet Plate Electrostatic Precipitator</div> <div style="width: 33%;"><input type="checkbox"/> Dry Plate Electrostatic Precipitator</div> </div>		
List the pollutants for which this device is intended to control and the capture and control efficiencies.		
Pollutant	Capture Efficiency	Control Efficiency
Particulate Matter	100%	99%
Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.). Design Flow Rate = 4,400 CFM Number of Bags = 88		
Is this device subject to the CAM requirements of 40 C.F.R. 64? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Complete ATTACHMENT H If No, Provide justification.		
Describe the parameters monitored and/or methods used to indicate performance of this control device. Daily inspection to insure proper operation (Differential pressure check) Broken bag detectors.		

ATTACHMENT G - Air Pollution Control Device Form		
Control device ID number: ESP	List all emission units associated with this control device. WoodFurn	
Manufacturer: PPC Industries	Model number: 20R-1230-2712	Installation date: 05/01/1995
Type of Air Pollution Control Device:		
<div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"><input type="checkbox"/> Baghouse/Fabric Filter</div> <div style="width: 33%;"><input type="checkbox"/> Venturi Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Multiclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Bed Adsorber</div> <div style="width: 33%;"><input type="checkbox"/> Packed Tower Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Single Cyclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Drum(s)</div> <div style="width: 33%;"><input type="checkbox"/> Other Wet Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Cyclone Bank</div> <div style="width: 33%;"><input type="checkbox"/> Catalytic Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Condenser</div> <div style="width: 33%;"><input type="checkbox"/> Settling Chamber</div> <div style="width: 33%;"><input type="checkbox"/> Thermal Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Flare</div> <div style="width: 33%;"><input type="checkbox"/> Other (describe) _____</div> <div style="width: 33%;"><input type="checkbox"/> Wet Plate Electrostatic Precipitator</div> <div style="width: 33%;"><input checked="" type="checkbox"/> Dry Plate Electrostatic Precipitator</div> </div>		
List the pollutants for which this device is intended to control and the capture and control efficiencies.		
Pollutant	Capture Efficiency	Control Efficiency
Particulate Matter	100%	84%
Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.). Gas flow rate: 110,000 ACFM Operating temperature: 450 F Operating pressure: 14.7 psia Pressure drop: 0.5 W.C. Gas velocity: 3.06 ft/sec Treatment time: 6.7 sec		
Is this device subject to the CAM requirements of 40 C.F.R. 64? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Complete ATTACHMENT H If No, Provide justification.		
Describe the parameters monitored and/or methods used to indicate performance of this control device. Operating voltages on the ESP of 20 to 60 Killivolts. Operating current on the ESP of 100 to 500 Milliamps. Monitored parameters are recorded once every 24 hours.		

ATTACHMENT G - Air Pollution Control Device Form		
Control device ID number: MClone	List all emission units associated with this control device. WoodFurn	
Manufacturer: Multi-Tube Enterprises	Model number: DC-12 Size 50	Installation date: 05/01/1995
Type of Air Pollution Control Device:		
<div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"><input type="checkbox"/> Baghouse/Fabric Filter</div> <div style="width: 33%;"><input type="checkbox"/> Venturi Scrubber</div> <div style="width: 33%;"><input checked="" type="checkbox"/> Multiclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Bed Adsorber</div> <div style="width: 33%;"><input type="checkbox"/> Packed Tower Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Single Cyclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Drum(s)</div> <div style="width: 33%;"><input type="checkbox"/> Other Wet Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Cyclone Bank</div> <div style="width: 33%;"><input type="checkbox"/> Catalytic Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Condenser</div> <div style="width: 33%;"><input type="checkbox"/> Settling Chamber</div> <div style="width: 33%;"><input type="checkbox"/> Thermal Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Flare</div> <div style="width: 33%;"><input type="checkbox"/> Other (describe) _____</div> <div style="width: 33%;"><input type="checkbox"/> Wet Plate Electrostatic Precipitator</div> <div style="width: 33%;"><input type="checkbox"/> Dry Plate Electrostatic Precipitator</div> </div>		
List the pollutants for which this device is intended to control and the capture and control efficiencies.		
Pollutant	Capture Efficiency	Control Efficiency
Particulate Matter	100%	70%
Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.). Gas flow rate: 110,000 ACFM Operating temperature: 650 F Operating pressure: 14.7 psia Inlet gas velocity: 2700 ft/sec		
Is this device subject to the CAM requirements of 40 C.F.R. 64? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Complete ATTACHMENT H If No, Provide justification.		
Describe the parameters monitored and/or methods used to indicate performance of this control device. Pressure drop of 2 to 6 inches W.C. (H ₂ O) across the Multiclone.		

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: 3C	List all emission units associated with this control device. 005-09 Sealer Spray Booth
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Manufacturer: Custom Design	Model number: NA	Installation date: Pending Permit Approval for 2016
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Type of Air Pollution Control Device:

<input type="checkbox"/> Baghouse/Fabric Filter	<input type="checkbox"/> Venturi Scrubber	<input type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Adsorber	<input type="checkbox"/> Packed Tower Scrubber	<input type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input type="checkbox"/> Flare	<input checked="" type="checkbox"/> Other (describe) <input type="checkbox"/> Pleated Cartridge Filter <input type="checkbox"/>
<input type="checkbox"/> Wet Plate Electrostatic Precipitator	<input type="checkbox"/> Dry Plate Electrostatic Precipitator	

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM10	100%	90%
MDI – HAP	100%	90%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

The sealer spray booth will be equipped with a ventilation enclosure hood to keep the system under negative pressure at all times. MDI ambient monitors will be located around the spray booth to detect the presents of any sealer that should not be collected by the control system. A 6,000 scfm reverse pitch fan will pull the exhaust through a (MERV 8) cartridge filter to capture and remove the PM HAP from the exhaust stream. The pressure drop across the filter(s) will be monitored.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ☐ Yes ☒ No

If Yes, **Complete ATTACHMENT H**

If No, **Provide justification.** Miscellaneous coating operations were evaluated by the Plywood and Composite Wood Products MACT. Therefore the sealing operations controlled by this device are included as part of the affected source under the following CAAA 112 MACT standard: 40CFR63, Subpart DDDD.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

MDI monitors around the spray booth will be used to shut down the spray operation if a positive detection of the chemical sealer is measured. The permittee will also monitor the pressure drop across the filter media to assure the control system is operating efficiently.

SUGGESTED PERMIT CHANGES

Title V Renewal Application

**Buckhannon Facility, 097-00029
Buckhannon, West Virginia**

Weyerhaeuser NR Company
41 TJM Drive
Buckhannon, West Virginia

September 2015

Earl Ray Tomblin
Governor

Randy C. Huffman
Cabinet Secretary

Permit to Operate



*Pursuant to
Title V
of the Clean Air Act*

Issued to:
WEYERHAEUSER NR COMPANY
Buckhannon Facility
R30-09700029-2016

John A. Benedict

Director

Issued: Draft • Effective: Draft
Expiration: March 25, 2016 • Renewal Application Due: September 25, 2015

Permit Number: **R30-09700029-2016**
Permittee: **Weyerhaeuser NR Company**
Facility Name: **Buckhannon Facility**
Mailing Address: **41 TJM Drive, Buckhannon, WV 26201**

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 C Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Facility Location:	Buckhannon, Upshur County, West Virginia
Mailing Address:	41 TJM Drive, Buckhannon, WV 26201
Telephone Number:	(304) 472-8564
Type of Business Entity:	Corporation
Facility Description:	Wood Engineered Product Manufacturing Facility
SIC Codes:	2493 Primary; N/A Secondary; N/A Tertiary
UTM Coordinates:	568.00 km Easting; 4,316.50 km Northing; Zone 17

Permit Writer:

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.

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Source-specific Requirements

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APPENDIX --- 45CSR2 Monitoring Plan

1.1. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
Furnace Group 001					
001-01	WoodFurn	Wood Fired Furnace	1995	116 MMBtu/hr	ESP, MClone
001-02	StandByFurn1	Standby Furnace	1995	40 MMBtu/hr	None
Veneer Group 003					
003-01	VeneerDryr	Two (2) Veneer Dryers	1995	42,000 LB/hr	None
Microllam Manufacturing Process Group 004					
004-01	MlamPress	Two (2) Microllam Press	1995	456 ft ³ / hr	None
004-02	MlamReman1	Microllam Reman Equipment #1	1995	Not Applicable	BGHS4
004-03	MlamReman2	Microllam Reman Equipment #2	1995	Not Applicable	BGHS3
004-04	Mlam Tanks	Microllam Resin Tanks	1995	10,000 Gallons Each	None
004-05	DrySilo	Dry Fuel Silo	1995	26,932 ft ³	BGHS5
004-06	MlamBooth	Microllam Spray Booth	2003	Not Applicable	None
004-07	Chip Bin	Storage of Green, Wet Wood Chips	1995	13,600 ft ³	None
004-08	Fuel House	Storage of Wood Fuel	1995	96,000 ft ³	None
Parallam Stranding Operations and ReManufacturing Group 005					
005-01	PlamPress	Parallam Press	1995	456 ft ³ / hr	None
005-03	PlamLayup	Parallam Standing Operation	1995	Not Applicable	BGHS1
005-04	PlamReman1	Parallam Reman Equipment #1	1995	Not Applicable	BGHS2A
005-05	PlamReman2	Parallam Reman Equipment # 2	1995	Not Applicable	BGHS2B
005-06	PlamTanks	Parallam Resin Tanks	1995	15,000 Gallons Each	None
005-07	E07	Parallam Sealer Bulk Tank	2016	6,000 gal	None
005-08	E08	Parallam Sealer Day/Mix Tank	2016	350 gal	None
005-09	E09	Parallam Sealer Spray Booth	2016	9.12 lb/hr	3C

1.2. Active R13, R14, and R19 Permits

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) is listed below.

Permit Number	Date of Issuance
R13-1843B	March 27, 2009

2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.
- 2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.

2.2. Acronyms

CAAA	Clean Air Act Amendments	NO_x	Nitrogen Oxides
CBI	Confidential Business Information	NSPS	New Source Performance
CEM	Continuous Emission Monitor		Standards
CES	Certified Emission Statement	PM	Particulate Matter
C.F.R. or CFR	Code of Federal Regulations	PM₁₀	Particulate Matter less than
CO	Carbon Monoxide		10µm in diameter
C.S.R. or CSR	Codes of State Rules	pph	Pounds per Hour
DAQ	Division of Air Quality	ppm	Parts per Million
DEP	Department of Environmental Protection	PSD	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	psi	Pounds per Square Inch
HAP	Hazardous Air Pollutant	SIC	Standard Industrial Classification
HON	Hazardous Organic NESHAP		
HP	Horsepower	SIP	State Implementation Plan
lbs/hr or lb/hr	Pounds per Hour	SO₂	Sulfur Dioxide
LDAR	Leak Detection and Repair	TAP	Toxic Air Pollutant
m	Thousand	TPY	Tons per Year
MACT	Maximum Achievable Control Technology	TRS	Total Reduced Sulfur
		TSP	Total Suspended Particulate
mm	Million	USEPA	United States Environmental Protection Agency
mmBtu/hr	Million British Thermal Units per Hour		
mmft³/hr or mmcf/hr	Million Cubic Feet Burned per Hour	UTM	Universal Transverse Mercator
NA or N/A	Not Applicable	VEE	Visual Emissions Evaluation
NAAQS	National Ambient Air Quality Standards	VOC	Volatile Organic Compounds
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		

2.3. Permit Expiration and Renewal

- 2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.
[45CSR§30-5.1.b.]
- 2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.
[45CSR§30-4.1.a.3.]
- 2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.
[45CSR§30-6.3.b.]
- 2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.
[45CSR§30-6.3.c.]

2.4. Permit Actions

- 2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[45CSR§30-5.1.f.3.]

2.5. Reopening for Cause

- 2.5.1. This permit shall be reopened and revised under any of the following circumstances:
 - a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.
 - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.
 - c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

[45CSR§30-6.6.a.]

2.6. Administrative Permit Amendments

- 2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.
[45CSR§30-6.4.]

2.7. Minor Permit Modifications

- 2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.
[45CSR§30-6.5.a.]

2.8. Significant Permit Modification

- 2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.
[45CSR§30-6.5.b.]

2.9. Emissions Trading

- 2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.
[45CSR§30-5.1.h.]

2.10. Off-Permit Changes

- 2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:
- a. The change must meet all applicable requirements and may not violate any existing permit term or condition.
 - b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
 - c. The change shall not qualify for the permit shield.
 - d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.
 - e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.
-

- f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

[45CSR' 30-5.9.]

2.11. Operational Flexibility

- 2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.

[45CSR§30-5.8]

- 2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.

[45CSR§30-5.8.a.]

- 2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

- a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or
- b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

[45CSR§30-5.8.c.]

- 2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

[45CSR§30-2.39]

2.12. Reasonably Anticipated Operating Scenarios

2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.

- a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.
- b. The permit shield shall extend to all terms and conditions under each such operating scenario; and
- c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

2.13. Duty to Comply

2.13.1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

[45CSR§30-5.1.f.1.]

2.14. Inspection and Entry

2.14.1. The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

[45CSR§30-5.3.b.]

2.15. Schedule of Compliance

- 2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:
- a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
 - b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

[45CSR§30-5.3.d.]

2.16. Need to Halt or Reduce Activity not a Defense

- 2.16.1. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

[45CSR§30-5.1.f.2.]

2.17. Emergency

- 2.17.1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

[45CSR§30-5.7.a.]

- 2.17.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of 45CSR§30-5.7.c. are met.

[45CSR§30-5.7.b.]

- 2.17.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The permitted facility was at the time being properly operated;
- c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

- d. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, the permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

[45CSR§30-5.7.c.]

- 2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

[45CSR§30-5.7.d.]

- 2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

[45CSR§30-5.7.e.]

2.18. Federally-Enforceable Requirements

- 2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.

[45CSR§30-5.2.a.]

- 2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-enforceable" requirements upon SIP approval by the USEPA.

2.19. Duty to Provide Information

- 2.19.1. The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

[45CSR§30-5.1.f.5.]

2.20. Duty to Supplement and Correct Information

- 2.20.1. Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

[45CSR§30-4.2.]

2.21. Permit Shield

- 2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.

[45CSR§30-5.6.a.]

- 2.21.2. Nothing in this permit shall alter or affect the following:

- a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or
- b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.
- c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

[45CSR§30-5.6.c.]

2.22. Credible Evidence

- 2.22.1. Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.

[45CSR§30-5.3.e.3.B. and 45CSR38]

2.23. Severability

- 2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.

[45CSR§30-5.1.e.]

2.24. Property Rights

- 2.24.1. This permit does not convey any property rights of any sort or any exclusive privilege.

[45CSR§30-5.1.f.4]

2.25. Acid Deposition Control

- 2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.
- a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.
 - b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.
 - c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

[45CSR§30-5.1.d.]

- 2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.

[45CSR§30-5.1.a.2.]

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause or allow any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145 (b) (3) (i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40 C.F.R. § 61.145 (b) and 45CSR34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
[45CSR§11-5.2]
- 3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality.
[W.Va. Code § 22-5-4(a)(14)]
- 3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

[40 C.F.R. 82, Subpart F]

- 3.1.8. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.

[40 C.F.R. 68]

- 3.1.9. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in subsections 45CSR§7- 3.2 (See Section 3.1.10), 3.3, 3.4, 3.5, 3.6, and 3.7 (See Section 3.1.11.).

[45CSR§7-3.1., 45CSR13, R13-1843, B.4.]

- 3.1.10. The provisions of Section 3.1.9 [45CSR§7-3.1.] shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period.

[45CSR§7-3.2.]

- 3.1.11. No person shall cause, suffer, allow or permit visible emissions from any storage structure(s) associated with any manufacturing process(es) that pursuant to Section 3.1.14 [45CSR§7-5.1.] is required to have a full enclosure and be equipped with a particulate matter control device.

[45CSR§7-3.7., 45CSR13, R13-1843, B.4. (004-07, 004-05, and 004-08)]

- 3.1.12. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A of 45CSR7. Following table list the equipment with their allowable stack emission rates.

Stack Emission Sources		Allowable Stack Emission Rate
Emission Unit ID	Emission Point ID	LB PM/hr
003-01	VeneerDryr	31.2
004-02	MLAMREMAN1	12.208
004-03	MLAMREMAN2	12.208
005-03	PLAMLAYUP	12.208
005-04	PLAMREMAN1	12.208
005-05	PLAMREMAN2	12.208

[45CSR§7-4.1., 45CSR13, R13-1843, B.4.]

- 3.1.13. Any stack serving any process source operation or air pollution control equipment on any process source operation shall contain flow straightening devices or a vertical run of sufficient length to establish flow patterns consistent with acceptable stack sampling procedures.

[45CSR§7-4.12.]

- 3.1.14. No person shall cause, suffer, allow, or permit any manufacturing process generating fugitive particulate matter to operate that is not equipped with a system to minimize the emissions of fugitive particulate matter. To minimize means that a particulate capture or suppression system shall be installed to ensure the lowest fugitive particulate emissions reasonably achievable.
[45CSR§7-5.1., 45CSR13, R13-1843, B.4.]
- 3.1.15. The owner or operator of a plant shall maintain dust control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary dust suppressants shall be applied in relation to stockpiling and general material handling to prevent dust generation and atmospheric entrainment.
[45CSR§7-5.2., 45CSR13, R13-1843, B.4.]
- 3.1.16. Due to unavoidable malfunction of equipment, emissions exceeding those set forth in 45CSR7 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, the Director provided a corrective program has been submitted by the owner or operator and approved by the Director may grant additional time periods.
[45CSR§7-9.1.]
- 3.1.17. Maintenance operations (as defined in 45CSR7) shall be exempt from the provisions of 45CSR§7-4 provided that at all times the owner or operator shall conduct maintenance operations in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source.
[45CSR§7-10.3.]
- 3.1.18. The permitted facility shall be constructed and operated in accordance with information filed in Permit Application R13-1843A, R13-1843B and any amendments thereto. The Director may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to.
[45CSR13, R13-1843, C.2.]
- 3.1.19. Owners and operators of chemical processing units or facilities subject to the requirements of 45CSR27 shall prevent and control working and filling losses of toxic air pollutants from tanks by routing such tank emissions to Best Available Technology (BAT) control devices. The Director may approve the use of floating roof storage tanks as BAT, provided that such tanks are designed and operated in a manner which minimizes toxic air pollutant emissions taking into consideration the toxic air pollutant emission rate, tank size, and control efficiency associated with such tanks. On a case-by-case basis, the Director may exempt very small process or storage tanks or tanks storing material mixtures containing low mass fractions of toxic air pollutants from the BAT requirements taking into consideration the actual level of emissions control and/or the toxic air pollutant emission rate from the tank.
[45CSR§27-5.1, 45CSR13, R13-1843, B.7.]
- 3.1.20. Under 45CSR27, the facility's Best Available Technology (BAT) requirement was satisfied by using only low formaldehyde resins in the process. The facility shall use liquid phenol-formaldehyde resin formulations for use in making product. The resin formulations are not to contain more than 0.1% free formaldehyde.
[45CSR§30-12.7., 004-01 and 005-01]

- 3.1.21. Air pollutant emissions from the emission point, VeneerDryr, serving the two (2) wood veneer screen dryers shall not exceed any of the following limitations:

Pollutant	Emission Rate (LB/hr)
Particulate Matter (PM) All Stacks	31.2
Particulate Matter (PM) Per Cooling Stack	7.40
Particulate Matter (PM) Per Drying Stack	1.0
Volatile Organic Compounds (VOC) (All Stacks)	18.0

[45CSR13, R13-1843, A.10., 003-01]

- 3.1.22. The following maximum emissions from the fabric filter system shall not be exceeded:

<u>Emission Unit ID</u>	Emission Point ID	Pollutant	Emission Rate (LB/hr)
005-03	PlamLayup	Particulate Matter	2.40
005-05	PlamReman2	Particulate Matter	2.18
005-04	PlamReman1	Particulate Matter	1.91
004-02	MlamReman1	Particulate Matter	1.71
004-03	MlamReman2	Particulate Matter	1.14
004-05	DrySilo	Particulate Matter	0.19

[45CSR13, R13-1843, A.11.]

- 3.1.23. The use of liquid phenol-formaldehyde resin in the Microllam™ LVL and Parallam® PSL presses shall be so controlled that the emissions of formaldehyde shall not exceed 0.40 pounds per hour from the Microllam Process (both presses combined) and 1.15 pounds per hour from the Parallam Process. Compliance with this will show compliance with R13-1843B, Specific Requirement A.3.

[45CSR§30-12.7., 45CSR13, R13-1843, A.3., 004-01 and 005-01]

- 3.1.24. The permittee shall process only Yellow Poplar, except that alternate wood species of hardwood and soft hardwood with estimated emissions for VOCs equal to or less than that assumed in developing the emission limits in R13-1843B for Yellow Poplar may also be processed in compliance with the conditions of this permit. Estimated emissions for such alternate wood species shall be determined by reference to the latest edition of AP-42 factors at the time of processing, by reference to another authoritative emission factors source approved by the Director, or, at the permittee's option, by testing for a period not to exceed a two-month duration during which emission data would be obtained to determine continuing compliance with the conditions of this permit. For alternative softwood species whose VOC emissions estimates may be greater than the VOC emission estimates assumed for Yellow Poplar in developing the emission limits in R13-1843B, the permittee shall conduct testing as just described pursuant to a protocol submitted by the permittee and approved by the Director to obtain emission data on VOCs to determine whether such species may be processed in compliance with the conditions of this permit or whether a permit modification is necessary to allow such processing.

[45CSR13, R13-1843, A.1.]

- 3.1.25. No more than 8,840 tons of premixed liquid phenol-formaldehyde resin shall be charged to the Microllam™ LVL presses on an annual basis.

[45CSR13, R13-1843, A.2., 004-01]

- 3.1.26. No more than 13,000 tons of liquid phenol-formaldehyde resin shall be charged to the Parallam® PSL press on an annual basis.
[45CSR13, R13-1843, A.4., 005-01]
- 3.1.27. No more than a combined 42,000 pounds per hour of dry veneer shall be produced in both of the wood veneer screen dryers.
[45CSR13, R13-1843, A.5., 003-01]
- 3.1.28. The average maximum temperature set point for each of the two-(2) wood veneer screen dryers shall not exceed 500 °F.
[45CSR13, R13-1843, A.6., 003-01]
- 3.1.29. Fugitive dust control measures shall be operated and maintained in such a manner as to minimize fugitive dust generation and atmospheric entrainment. Such measures shall include but not be limited to the following:
- i. Ash shall be thoroughly wetted via a wet transfer conveyor prior to handling.
 - ii. Wetted ash shall be loaded into sealed metal containers prior to transport to an off-site location.
 - iii. The bark hog hammermill shall be fully enclosed.
 - iv. The chipper shall be fully enclosed.
 - v. The area surrounding the hammermill and chipper shall be cleaned of wood dust as often as necessary to prevent the wood particles from drying and becoming airborne.
 - vi. Facility roadways, associate (employee) and visitor parking areas, and product loading areas shall be paved with asphalt or concrete, or shall be graveled. Subject roadways and areas shall be watered using a pressurized water spray on an as needed basis.
 - vii. The dry fuel silo shall be covered.
 - viii. Material transfer from the dry fuel silo into trucks shall be conducted in a partially enclosed stall.
- [45CSR13, R13-1843, A.14.]**
- 3.1.30. Sealant used in the Microllam Spray Booth shall contain no more than 0.03 LB VOC per gallon of sealant.
[45CSR§30-12.7., 004-06]
- 3.1.31. Annual usage of sealant for Microllam Spray Booth shall not exceed 120,000 gallons per year.
[45CSR§30-12.7., 004-06]
- ~~3.1.32. When emissions on an annual basis of one or more of the greenhouse gases listed below are greater than the *de minimis* amounts listed below, all greenhouse gases emitted above the *de minimis* amounts shall be reported to the Secretary under 45CSR§42-4 (see Section 3.5.11.):~~

Greenhouse Gas Compound	tons/year
carbon dioxide	10,000
methane	476
nitrous oxide	32.6
hydrofluorocarbons	0.855
perfluorocarbons	1.09
sulfur hexafluoride	0.42

[45CSR§42-3.1., State Enforceable only.]

- 3.1.33. The permittee shall abide by the work practice standards associated with hardwood veneer dryers and Group 1 miscellaneous coating operations by using non-HAP coatings as defined in 40 C.F.R. § 63.2292.

[45CSR34, 40 C.F.R. § 63.2241 and 40 C.F.R. Part 63 Subpart DDDD, Table 3]

3.2. Monitoring Requirements

- 3.2.1. The permittee shall conduct monitoring/Record Keeping/reporting as follows, with exception of the “Veneer Dryer, Parallam Standing Operation, Parallam Reman Equipment #1, Parallam Reman Equipment #2, Microllam Reman Equipment #2, Microllam Reman Equipment #1” and Dry Fuel Silo, which are addressed in Section 3.2.3. [Not required for open stockpiles or haulroads.]
- a. The permittee shall perform monthly Method 22 visible emission observations for particulate matter emission activities for the emission sources identified in the Emission Unit Table, Section 1.0. These visible emission observations shall be conducted by a certified Method 9 observer during periods of normal operation for a sufficient time interval to determine if any of the subject emission points have visible emissions and if so, determine the opacity of the emissions. If any of the subject emission points have visible emissions exceeding the regulatory limit of twenty percent (20%) opacity, then a 45CSR7A evaluation shall be conducted immediately after the violation of the regulatory limit unless the permittee can demonstrate a valid reason that the time frame should be extended. A 45CSR7A evaluation shall not be required if the condition resulting in the excess visible emissions is corrected within 24 hours and the units are operated at normal operating conditions.
 - b. A record of each visible emissions observation shall be maintained, including any data required by 40 C.F.R. 60 Appendix A, Method 22 or 45CSR7A, whichever is appropriate. The record shall include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer. Records shall be maintained on site stating any maintenance or corrective actions taken as a result of the monthly observations, and the times the fugitive dust control system(s) are inoperable and any corrective actions taken.

[45CSR§30-5.1.c.]

- 3.2.2. The permittee shall operate all control devices and monitor each to ensure that they are operated and maintained to ensure the lowest fugitive particulate emissions reasonably achievable. The permittee shall maintain instrumentation on all dust collectors for pressure drop observations. The pressure drop across the baghouse will be measured once per month and the value recorded. The measured value shall be compared to the optimal operating pressure range as determined by the manufacturer. The permittee shall maintain records of the maintenance performed on each baghouse. These records shall include all maintenance work performed on each dust collector including the frequency of bag/filter change outs. Records shall state the date and time of each dust collector inspection, the inspection results, and corrective action taken, if any. Records shall be maintained on site for five (5) years from the record creation date.

[45CSR§30-5.1.c.]

- 3.2.3. The permittee shall monitor visible emissions from the Veneer Dryer, Parallam Standing Operation, Parallam Reman Equipment #1, Parallam Reman Equipment #2, Microllam Reman Equipment #2, Microllam Reman Equipment #1 and Dry Fuel Silo emission units in accordance with the following procedures, test methods and frequencies:

- i. 40 C.F.R. Part 60 Appendix A, Method 9 shall be used to determine opacity. Prior notification and pre-test plan are not required to be submitted for each test conducted. In accordance with Method 9, each observation shall be a minimum of six (6) minutes, unless any one 15 second reading is greater than the opacity limit for the emission unit, in which case the observation period shall be extended to a minimum of 60 minutes or until a violation of the emissions standard has been documented; whichever is a shorter period.
- ii. The permittee shall use the following monitoring schedule for conducting the visible emissions tests required by this condition:
 - a. The monitoring frequency for performing visible emission tests shall ~~be~~ be done on a quarterly basis. If any of the subject emissions point have visible emissions exceeding the applicable limits, the permittee shall perform visible emissions test as follows:

Emission Unit ID	Emission Point ID	Frequency
003-01	VeneerDryr	Weekly
004-02	MlamReman1	Monthly
004-03	MlamReman2	Monthly
004-05	DrySilo	Monthly
005-03	PlamLayup	Monthly
005-04	PlamReman1	Monthly
005-05	PlamReman2	Monthly

- b. If the visible emission tests conducted during six (6) consecutive weeks of operation show opacity within the applicable limits specified in Section 3.1.9, the tests need only be done once per month.
- c. If the tests conducted during four (4) consecutive months of operation show opacity within the applicable limits specified in Section 3.1.9 [45CSR§7-3.1], the tests need be done only once per quarter.
- d. If an exceedance of an applicable limit is observed, the observations for the exceeding emission point will start over with either weekly or monthly checks according to the monitoring frequency table above.

- iii. All visible emissions tests shall be conducted during operating conditions that have the potential to create visible emissions.
- iv. If the observer is unable to conduct the visual emission tests due to unit downtime, visual interference's caused by other visible emission sources (e.g. fugitive emissions during high wind conditions) or due to weather conditions such as fog, heavy rain, or snow, the observer shall note such conditions on the data observation sheet and make at least three (3) attempts to conduct the checks and/or tests at approximately 2-hour intervals throughout the day. The permittee shall attempt to make the observations daily until a valid observation period is completed.

[45CSR§30-5.1.c.]

3.2.4. To maintain VOC emission under 2 pounds per hour or 5 tons per year for the Microllam Spray Booth (MLAMBOOTH) (004-06), the following shall be monitored and recorded:

- VOC-content on a monthly basis,
- annual sealant usage is to be monitored on a monthly basis,
- fluid pressure, and
- spray gun tip size.

Fluid pressure and tip size shall be monitored and recorded daily with maximum values per the following table:

Tip Size (inches)	Maximum Fluid Pressure (PSI)
0.015	9239
0.017	5516
0.019	3405
0.021	2179
0.023	1668
0.025	1068
0.027	780

[45CSR§30-12.7., 004-06]

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:
 - a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.

- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
- d. The permittee shall submit a report of the results of the stack test within 60 days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
 - 1. The permit or rule evaluated, with the citation number and language.
 - 2. The result of the test for each permit or rule condition.
 - 3. A statement of compliance or non-compliance with each permit or rule condition.

[WV Code §§ 22-5-4(a)(14-15) and 45CSR13]

- 3.3.2. The Director, or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions other than those noted in 45CSR§10-3.
[45CSR§10-8.1.b.]
- 3.3.3. Compliance with the particulate matter emission limitation established for Sections 3.1.21 (003-01) and 3.1.22 (005-03, 005-04, 005-05, 004-03, 004-02, and 004-05) shall be demonstrated as described below:
 - a. To limit the facility's annual PM emissions from the veneer dryers, a throughput limit of 42,000 LB/hr of dry veneer is placed on the combined operation of the facility's dryers. This throughput limit shall be calculated and recorded each month, based on average monthly production and hours of operation.
 - b. The permittee shall practice the proper operation of the following baghouse systems: BGHS1, BGHS2A, BGHS2B, BGHS3, BGHS4 and BGHS5. This shall include installation of broken bag detectors, prompt replacement of broken bags, and daily inspections to insure proper operation.

At the Director's request the permittee shall utilize 40 C.F.R. Part 60 Appendix A, Method 5 or 5D for purposes of conducting performance tests, unless the Director approves an alternate or equivalent method. Requirements shall be met with respect to submission of a test protocol and notification of testing.

Requested change for DAQ consideration:

As a result of redundant monitoring and testing systems that have been established within (3.3.3.b.) for continuous bag leak detection systems, quarterly Method 9 VE testing (3.2.3.ii.), and monthly pressure drop monitoring (3.2.2.),

Weyerhaeuser would like to request the periodic Method 5 testing frequency be relaxed and changed to at the Director's discretion.

It's Weyerhaeuser's opinion that this testing requirement has become overly burdensome in light of having adequate measures in place for demonstrating continuous compliance. These PM sources have also successfully demonstrated compliance over the years with the exceptionally low limits of 3.1.22, which are reduced to approximately 10% of the 45CSR7 limits defined by 3.1.12.

The facility's historic Method 5 testing on these sources have been successful in demonstrating that existing monitoring, VE testing, and maintenance procedures are adequate in maintaining actual emissions below 50% of the Rule 13 limits. Because the Rule 13 limits were based on emission calculations submitted within the application, this means compliance testing has actually shown emissions are being maintained at approximately 5% of the Rule 7 limitations.

If the DAQ finds this request acceptable for the control systems that are mature and well defined, it would be very beneficial for the site to recognize a cost savings related to these testing expenses going forward. In light of the compliance testing associated with the boiler MACT, which starts this year, Weyerhaeuser would like to focus environmental efforts in an area where new monitoring systems have to be established.

~~Tests for particulate matter (PM) were conducted in August of 2005 and 2010 for veneer dryers, BGHS1, BGHS2A, and BGHS2B and resulted in mass emission rates \leq 50% for each test. The results of those tests showed that the current PM testing frequency is "Once/ 5 years." PM testing for BGHS3 and BGHS5 was~~

conducted in August of 2005 and August of 2008 and resulted in mass emission rates between 50% and 90%. The results of this test showed that the current PM testing frequency is "Once/3 years." PM testing for BGHS4 was conducted in August of 2005 and resulted in mass emission rates > 90%. The results of this test showed that the current PM testing frequency is "Annual." Tests for BGHS4 were conducted in 2006, 2007, and 2008. The result in mass emission rates for these three (3) successive annual tests was ≤ 50%. The result of these tests showed that the current PM testing frequency is "Once/5 years." Subsequent testing to determine compliance with the particulate matter (PM) limitations of Sections 3.1.21 and 3.1.22 shall be conducted in accordance with the schedule set forth in the following table.

Test	Test Results	Testing Frequency
Annual	If annual testing is required, after two successive tests indicate mass emission rates between 50% and 90% particulate matter (PM)	Once/3 years
Annual	If annual testing is required, after three successive tests indicate mass emission rates ≤ 50% of particulate matter (PM)	Once/5 years
Once/3 years	If testing is required once/3 years, after two successive tests indicate mass emission rates ≤ 50% of particulate matter (PM) limit	Once/5 years
Once/3 years	If testing is required once/3 years and any tests indicate mass emission rates between 50% and 90 % (PM) limits	Once/3 years
Once/3 years	If testing is required once/3 years and any test indicates a mass emission rate ≥ 90% of particulate matter (PM) limit	Annual
Once/5 years	If testing is required once/5 years and any test indicates a mass emission rate ≤ 50% of particulate matter (PM) limit	Once/5 years
Once/5 years	If testing is required once /5 years and any test indicates mass emission rates between 50% and 90 % of particulate matter (PM) limit	Once/3 years
Once/5 years	If testing is required once/5 years and any test indicates a mass emission rate ≥ 90% of particulate matter (PM) limit	Annual

[45CSR§30-5.1.c., 45CSR13, B.18., 003-01, 005-03, 005-04, 005-05, 004-02, 004-03, and 004-05]

- 3.3.4. Compliance with the volatile organic compound emission limitations established for the Veneer Dryer shall be demonstrated as follows:
- a. If a species of wood other than Yellow Poplar is processed, it should be demonstrated that it exhibits equal VOC emitting properties to that of Yellow Poplar, or less. This demonstration shall be conducted prior to use of such wood species, and shall be recorded and maintained on site for five (5) years from the date of demonstration.
 - b. The permittee shall monitor and record the following parameters for the Veneer Dryer. Unless different ranges for the parameters (veneer dryers' maximum average temperature) are established through 40 C.F.R. Part 60 Appendix, Method 25 or 25A, which demonstrate compliance with the volatile organic compound emission limitation, said parameters shall be maintained within the design specifications indicated below. If new parameter (veneer dryers' maximum average temperature) ranges are established through 40 C.F.R. Part 60 Appendix, Method 25 or 25A, the permit must be revised to reflect the new ranges which will be relied on to demonstrate compliance with the volatile organic compound emission limitation.
 - i. A production limit of 42,000 LB/hr of dry veneer is placed on the combined operation of the facility's dryers. This production limit shall be calculated and recorded each month, based on average monthly production and hours of operation.

- ii. The maximum average temperature for the veneer dryers is between 300 to 550 °F. An average temperature for all heating zones will be recorded each shift
- iii. Maintain compliance with the provision mandated by the Air Quality Board on September 11, 1995, as specified in 40 C.F.R. Part 60 Appendix, Method 25 or 25A;
- c. The permittee may conduct an approved compliance test to demonstrate that the Veneer Dryers units can operate in compliance with their emission limits with parameters outside the ranges specified in the compliance determination methods above or at production rates greater than the current limits.

[45CSR§30-5.1.c., 45CSR13, R13-1843, B.22., 003-01]

3.4. Recordkeeping Requirements

- 3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:

- a. The date, place as defined in this permit and time of sampling or measurements;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of the analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

[45CSR§30-5.1.c.2.A.]

- 3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.

[45CSR§30-5.1.c.2.B.]

- 3.4.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.

[45CSR§30-5.1.c. State-Enforceable only.]

- 3.4.4. The owner or operator shall keep copies of all records required under 40 C.F.R. § 60.115b, except for the record required by Section 3.4.5 [40 C.F.R. § 60.116b (b)], for at least 5 years. The record required by 40 C.F.R. § 60.116b (b) will be kept for the life of the source. Permittee is to determine the dimension and capacity of the tank(s) for the life of the tank(s).

[45CSR16, 40 C.F.R. § 60.116b (a), 005-06]

3.4.5. The owner or operator of each storage vessel as specified in Section 3.4.4 [40 C.F.R. § 60.110b (a)] shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. Each storage vessel with a design capacity less than 75 m³ is subject to no provision of this subpart other than those required by 40 C.F.R. § 60.116b.
[45CSR16, 40 C.F.R. § 60.116b (b), 005-06]

3.4.6. The following information shall be recorded in logs and maintained at the permitted facility for a period of five (5) years, and made available to the Director of the Division of Air Quality, or his/her designated representative, upon request:

- a. Amount of dried veneer in pounds per hour produced in the dryers on an hourly basis back calculated from calendar monthly dryer throughput,
- b. Amount of resin in pounds per hour charged to MicrollamTM LVL presses on an hourly basis back calculated from calendar monthly production,
- c. Amount of resin in tons per month charged to MicrollamTM LVL presses on a monthly basis back calculated from calendar monthly production,
- d. Amount of resin in pounds per hour charged to the Parallam[®] PSL press on an hourly basis back calculated from calendar monthly production,
- e. Amount of resin in tons per month charged to the Parallam[®] PSL press on a monthly basis back calculated from calendar monthly production.

[45CSR13, R13-1843, B.15., 004-01 and 005-01]

3.4.7. The permittee shall record usage of sealant in Sections 3.1.30 and 3.1.31, in addition to maximum VOC-content of sealant used on a monthly basis. The records shall be maintained on site and made available to the Director of the Division of Air Quality, or his/her designated representative, upon request.
[45CSR§30-5.1.c., 004-06]

3.4.8. Unless the EPA Administrator has approved a different schedule for submission of reports under 40 C.F.R. § 63.10 (a), you must submit each report by the date in Table 9 to 40 C.F.R. Part 63 Subpart DDDD and as specified in 40 C.F.R. §§ 63.2281 (b) (3) through (5).
[45CSR34, 40 C.F.R. § 63.2281 (b), 003-01]

3.4.9. The compliance report must contain the information in 40 C.F.R. §§ 63.2281 (c) (1) through (4) and (7).

- (1) Company name and address.
- (2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
- (3) Date of report and beginning and ending dates of the reporting period.
- (4) If there are no deviations from any applicable compliance option or operating requirement, and there are no deviations from the requirements for work practice requirements in Table 8 to 40 C.F.R. Part 63 Subpart DDDD, a statement that there were no deviations from the compliance options, operating requirements, or work practice requirements during the reporting period.

[45CSR34, 40 C.F.R. §§ 63.2281 (c) (1) – (3) and (7), Table 8, Items 2 and 5, 003-01]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
[45CSR§§30-4.4. and 5.1.c.3.D.]
- 3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3 pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
[45CSR§30-5.1.c.3.E.]
- 3.5.3. Except for the electronic submittal of the annual certification to the USEPA as required in 3.5.5 below, all notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, mailed first class or by private carrier with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Phone: 304/926-0475
FAX: 304/926-0478

If to the US EPA:

Associate Director
Office of Enforcement and Permits Review
(3AP12)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

- 3.5.4. **Certified emissions statement.** The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality.
[45CSR§30-8.]
- 3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The annual certification to the USEPA shall be submitted in electronic format only. It shall be submitted by e-mail to the following address: R3_APD_Permits@epa.gov. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification.
[45CSR§30-5.3.e.]
- 3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4.
[45CSR§30-5.1.c.3.A.]
- 3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.

3.5.8. **Deviations.**

- a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:
 1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.
 2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.
 3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.
 4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

[45CSR§30-5.1.c.3.C.]

- b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.

[45CSR§30-5.1.c.3.B.]

- 3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.

[45CSR§30-4.3.h.1.B.]

- 3.5.10. The formaldehyde emission to the air resulting from an abnormal release or spill in excess fifty (50) pounds shall be reported to the Director or his authorized representative not later than 24-hours after the chemical processing unit owner/operator has knowledge of such emission. Under 45CSR27, the facility's Best Available Technology (BAT) requirement was satisfied by using only low formaldehyde resins in the process.

The owner or operator shall file a written report with the Director stating the details of all such incidents resulting in the emission of more than fifty (50) pounds of any toxic air pollutant within seven (7) days of the occurrence. The owner/operator shall submit to the Director, at his request, records of all abnormal toxic air pollutant discharges to the air.

[45CSR§27-10.4, 45CSR13, R13-1843, B.7., 005-06]

- ~~3.5.11. **Greenhouse Gas Reporting Requirements.** When applicable, as determined in permit section 3.1.32, greenhouse gas emissions shall be reported pursuant to 45CSR§42-4 including the following:~~

- a. ~~In accordance with a reporting cycle provided by the Secretary, affected sources shall report to the Secretary the quantity of all greenhouse gases emitted above *de minimis* amounts in the years specified by the Secretary.~~
~~[45CSR§42-4.1., State-Enforceable only.]~~
- b. ~~Affected sources shall only be required to report annual quantities of anthropogenic non mobile source greenhouse gases emitted at the stationary source, and shall not be required to report biogenic emissions of greenhouse gases.~~
~~[45CSR§42-4.2., State-Enforceable only.]~~
- c. ~~Reports of greenhouse gas emissions submitted to the Secretary under 45CSR§42-4 shall be signed by a responsible official and shall include the following certification statement: "I, the undersigned, hereby certify that the data transmitted to the West Virginia Department of Environmental Protection is true, accurate, and complete, based upon information and belief formed after reasonable inquiry.~~
~~[45CSR§42-4.5., State-Enforceable only.]~~

3.6. Compliance Plan

- 3.6.1. None

3.7. Permit Shield

- 3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.
- 3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.

45CSR17	Weyerhaeuser Buckhannon Facility is subject to 45CSR7 which exempts it from 45CSR17, To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter, as stated in 45CSR§7-10.2.
45CSR21	Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds. Weyerhaeuser Buckhannon Facility is not located Cabell, Kanawha, Putnam, Wayne, or Wood counties.
45CSR33	Acid Rain Provisions and Permits do not apply to Weyerhaeuser Buckhannon Facility because it is not considered a Title IV (Acid Rain) Source.
40 C.F.R. Part 60 Subpart EE	Standards of Performance for Surface Coating of Metal Furniture. Weyerhaeuser Buckhannon Facility is not engaged in any form of metal furniture surface coating.
40 C.F.R. Part 60 Subpart MM	Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations. Weyerhaeuser Buckhannon Facility is not engaged in the coating of automobiles or light-duty trucks.
40 C.F.R. Part 60 Subpart RR	Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations. Weyerhaeuser Buckhannon Facility does not operate a coating line used in the manufacture of pressure sensitive tape and label materials.
40 C.F.R. Part 60 Subpart SS	Standards of Performance for Industrial Surface Coating: Large Appliances. Weyerhaeuser Buckhannon Facility is not engaged in the coating of large appliances.
40 C.F.R. Part 60 Subpart TT	Standards of Performance for Metal Coil Surface Coating. Weyerhaeuser Buckhannon Facility is not engaged in metal coil surface coating.

40 C.F.R. Part Subpart WW	Standards of Performance for the Beverage Can Surface Coating Industry. Buckhannon Facility is not engaged in beverage can surface coating.
40 C.F.R. Part 60 Subpart SSS	Standards of Performance for Magnetic Tape Coating Facilities. Buckhannon Facility is not engaged in coating continuous base film to produce magnetic tape.
40 C.F.R. Part 60 Subpart TTT	Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines. Weyerhaeuser Buckhannon Facility does not operate spray booths in which plastic parts for use in the manufacture of business machines receive prime coats, color coats, texture coats, or touch-up coats.
40 C.F.R. Part 63 Subpart H	National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks. Buckhannon Facility does not have a piece of equipment that either contains or contacts a fluid (liquid or gas) that is at least 5 percent by weight of total organic HAP's.
40 C.F.R. Part 63 Subpart JJ	National Emission Standards for Wood Furniture Manufacturing Operations. Weyerhaeuser Buckhannon Facility is not engaged in the manufacture of wood furniture or wood furniture components and the facility is not a major source as defined in 40 C.F.R. § 63.2
40 C.F.R. Part 63 Subpart KKKK	National Emission Standards for Surface Coating of Metal Cans. Weyerhaeuser Buckhannon Facility is not engaged in the manufacture of metal cans and the facility is not a major source as defined in 40 C.F.R. § 63.2.
40 C.F.R. Part 63 Subpart MMMM	National Emission Standards for Surface Miscellaneous Metal Parts. Weyerhaeuser Buckhannon Facility is not engaged in the manufacture of miscellaneous metal parts and the facility is not a major source as defined in 40 C.F.R. § 63.2.
40 C.F.R. Part 63 Subpart QQQQ	National Emission Standards for Surface Coating of Wood Building Products. Weyerhaeuser Buckhannon Facility is not engaged in the manufacture of wood building products and the facility is not a major source as defined in 40 C.F.R. § 63.2.
40 C.F.R. Part 63 Subpart SSSS	National Emission Standards for Metal Coil (Surface Coating). Weyerhaeuser Buckhannon Facility is not engaged in the manufacture of metal coil products and the facility is not a major source as defined in 40 C.F.R. § 63.2.
40 C.F.R. Part 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, or Institutional Boilers and Process Heaters. This MACT has been vacated and remanded by the United States Court of Appeals for the District of Columbia Circuit on July 30, 2007.
40 C.F.R. Part 64	CAM applies to any pollutant specific emissions units (PSEU) that satisfy all of the applicability criteria requirements of 40 C.F.R. § 64.2 (a), i.e., that: (1) have pre-control regulated pollutant potential emissions (PTE) equal to or greater than the "major" threshold limits to be classified as a major source; (2) are subject to an emission limitation or standard and; (3) have a control device to achieve compliance with such emission limitation or standard. Since this facility does not have PSEU that satisfy the requirements, it is not subject to the CAM rule.
40 C.F.R. Part 72	Acid Rain Program General Provisions does not apply to Weyerhaeuser because it is not considered a Title IV (Acid Rain) Source.

4.0 Source-Specific Requirements [Wood Fired Furnace (001-01) and Standby Furnance (001-02) of source Group 001, Control Device - Electrostatics Precipitator (ESP), Multiclone (MClon) and emission point ID(s) (WoodFurn and StandByFurn1)]

4.1. Limitations and Standards

- 4.1.1. ~~If US EPA has not already promulgated a standard pursuant to 40 C.F.R. 63 for industrial, commercial, institutional boilers and process heaters, the facility shall submit complete Part 2 112(j) "equivalent emission limitation by permit" application for case by case MACT determination, containing the information required in 40 C.F.R. § 63.53 (b), within thirty (30) days of the date for a final rule specified in the final order of the United States District Court for the District of Columbia, which is currently January 16, 2011. All 112(j) "equivalent emission limitation by permit" applications must be submitted to both WVDEP Division of Air Quality, and Chief of Permits and Technical Branch, US EPA Region III, Mail Code 3AP11, 1650 Arch Street, Philadelphia, PA, 19103-2029.~~
~~[45CSR34, 40 C.F.R. § 63.52]~~

Note: New boiler MACT requirements will apply in accordance with 40CFR63, Subpart DDDDD.

These requirements are defined with §63.7500 as follows:

Table 2, Item 7, a. for CO limited to 1,500 ppmvd corrected to 3% O₂
b. for Filterable PM limited to 0.037 lb/MMBtu of heat input

Table 3, Work Practice Standards, Items 4, 5, and 6. However, a compliance extension request has been submitted for the startup and shutdown standards defined within items 5 and 6. This is primarily due to the inability to operate the ESP safely while in high oxygen conditions during startup.

Table 4, Operating Limits, Item 4.a. for dry control systems – maintain opacity to less than or equal to 10 percent opacity with the use of a COMs or PM CPMS.

- 4.1.2. No person shall cause, suffer, allow, or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average.
[45CSR§2-3.1., 45CSR13, R13-1843, B.3.]
- 4.1.3. Compliance with the visible emission requirements of Section 4.1.2 [45CSR§2-3.1] shall be determined in accordance with 40 C.F.R. Part 60, Appendix A, Method 9 or by using measurements from continuous opacity monitoring systems approved by the Director. The Director may require the installation, calibration, and operation of continuous opacity monitoring systems and may establish policies for the evaluation of continuous opacity monitoring results and the determination of compliance with the visible emission requirements of Section 4.1.2 [45CSR§2-3.1]. Compliance opacity monitors shall not be required on fuel burning units, which employ wet scrubbing systems for emission control.
[45CSR§2-3.2., 45CSR13, R13-1843, B.3.]
- 4.1.4. No person shall cause, suffer, allow or permit the discharge of particulate matter into the open air from all fuel burning units located at one plant, measured in terms of pounds per hour in excess of the amount determined as follows:
- b. For Type 'b' fuel burning units, the product of 0.09 and the total design heat inputs for such units in million B.T.U.'s per hour, provided however that no more than six hundred (600) pounds per hour of particulate matter shall be discharged into the open air from all such units. For the equipment subject to 45CSR§§2-4.1and 4.1.b, compliance for particulate matter emissions will be shown by the more stringent requirements in Sections 4.1.20 and 4.1.21.

Furnaces	Allowable Limits
	LB/hr
Wood Fired Furnace	10.440
Standby Furnace	3.6

[45CSR§§2-4.1. and 4.1.b., 45CSR13, R13-1843, B.3.]

- 4.1.5. No person shall cause, suffer, allow or permit any source of fugitive particulate matter to operate that is not equipped with a fugitive particulate matter control system. This system shall be operated and maintained in such a manner as to minimize the emission of fugitive particulate matter. Sources of fugitive particulate matter associated with fuel burning units shall include, but not be limited to, the following:

- a. Stockpiling of ash or fuel either in the open or in enclosures such as silos;
- b. Transport of ash in vehicles or on conveying systems, to include spillage, tracking or blowing of particulate matter from or by such vehicles or equipment; and
- c. Ash or fuel handling systems and ash disposal areas.

[45CSR§2-5.1.]

- 4.1.6. The visible emission standards set forth in 45CSR§2-3 shall apply at all times except in periods of start-ups, shutdowns and malfunctions. Where the Director believes that start-ups and shutdowns are excessive in duration and/or frequency, the Director may require an owner or operator to provide a written report demonstrating that such frequent start-ups and shutdowns are necessary.

[45CSR§2-9.1.]

- 4.1.7. At all times, including periods of start-ups, shutdowns and malfunctions, owners and operators shall, to the extent practicable, maintain and operate any fuel burning unit(s) including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director, which may include, but is not limited to, monitoring results, visible emission observations, review of operating and maintenance procedures and inspection of the source.

[45CSR§2-9.2., 45CSR13, R13-1843, B.3.]

- 4.1.8. The owner or operator of a fuel burning unit(s) subject to 45CSR2 shall report to the Director any malfunction of such unit or its air pollution control equipment which results in any excess particulate matter emission rate or excess opacity (i.e., emissions exceeding the standards in 45CSR§§2-3 and 4) as provided in one of the following subdivisions:

- a. Excess opacity periods meeting the following conditions may be reported on a quarterly basis unless otherwise required by the Director:

- 1. The excess opacity period does not exceed thirty (30) minutes within any 24-hour period; and
- 2. Excess opacity does not exceed 40%.

- b. The owner or operator shall report to the Director any malfunction resulting in excess particulate matter or excess opacity, not meeting the criteria set forth in Section 4.1.8.a [45CSR§2-9.3.a], by telephone, telefax, or e-mail by the end of the next business day after becoming aware of such condition. The owner or operator shall file a certified written report concerning the malfunction with the Director within thirty (30) days providing the following information:

- 1. A detailed explanation of the factors involved or causes of the malfunction;
- 2. The date and time of duration (with starting and ending times) of the period of excess emissions;
- 3. An estimate of the mass of excess emissions discharged during the malfunction period;
- 4. The maximum opacity measured or observed during the malfunction;
- 5. Immediate remedial actions taken at the time of the malfunction to correct or mitigate the effects of the malfunction; and

6. A detailed explanation of the corrective measures or program that will be implemented to prevent a recurrence of the malfunction and a schedule for such implementation.

[45CSR§2-9.3., (001-01)]

- 4.1.9. No person shall cause, suffer, allow or permit the discharge of sulfur dioxide into the open air from all stacks located at one plant, measured in terms of pounds per hour, in excess of the amount determined as follows:
- f. For Type 'b' and Type 'c' fuel burning units, the product of 3.2 and the total design heat inputs for such units discharging through those stacks in million BTU's per hour. For the equipment subject to 45CSR§§10-3.3 and 3.3.f, compliance for sulfur dioxide emissions will be shown by the more stringent requirements in Sections 4.1.20 and 4.1.21.

Furnace	Allowable Limits
	LB/hr
Wood Fired Furnace	371.2
Standby Furnace	128

[45CSR§§10-3.3. and 3.3.f., 45CSR13, R13-1843, B.5.]

- 4.1.10. Allowable Emission Rates for Individual Stacks.
- a. Unless otherwise approved by the Director, the maximum allowable emission rate for an individual stack shall not exceed by more than twenty-five percent (25%) the emission rate determined by prorating the total allowable emission rate specified in 45CSR§§10-3.1, 3.2, or 3.3, on the basis of individual unit heat input at design capacity for all fuel burning units discharging through that stack.

[45CSR§§10-3.4. and 3.4.a., 45CSR13, R13-1843, B.5.]

- 4.1.11. ~~No person shall cause, suffer, allow, or permit the emission into open air from any source operation an in-stack sulfur dioxide concentration exceeding 2000 ppmv by volume from existing source operations, except as provided in 45CSR§10-4.1.~~
- e. ~~Any owner or operator of a manufacturing process source operation(s) which has the potential to emit less than 500 pounds per year of sulfur oxides.~~

[45CSR§§10-4.1. and 4.1.e., 001-01]

Note to DAQ for Consideration: This furnace is considered a fuel burning unit under this rule and therefore the concentration limitation defined for manufacturing sources under this rule does not seem to apply. Please consider removing this requirement.

- 4.1.12. ~~Compliance with the allowable sulfur dioxide concentration limitations from manufacturing process source operation(s) set forth in 45CSR10 shall be based on a block three (3) hour averaging time.~~
[45CSR§10-4.2., 001-01]
- 4.1.13. Due to unavoidable malfunction of equipment or inadvertent fuel shortages, emissions exceeding those provided for in 45CSR10 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the equipment malfunction or fuel shortage. In cases of major equipment failure or extended shortages of conforming fuels, the Director provided a corrective program has been submitted by the owner or operator and approved by the Director may grant additional time periods.
[45CSR§10-9.1.]

4.1.14. On and after the date on which the initial performance test is completed or is required to be completed under 40 C.F.R. § 60.8, whichever date comes first, no owner or operator of an affected facility that combusts wood, or wood with other fuels, except coal, shall cause to be discharged from that affected facility any gases that contain particulate matter in excess of the following emission limits:

- (1) 43 Ng/J (0.10 LB/million Btu) heat input if the affected facility has an annual capacity factor greater than 30 percent (0.30) for wood.
- (2) 86 Ng/J (0.20 LB/million Btu) heat input if
 - (i) The affected facility has an annual capacity factor of 30 percent (0.30) or less for wood,
 - (ii) Is subject to a federally enforceable requirement limiting operation of the affected facility to an annual capacity factor of 30 percent (0.30) or less for wood, and
 - (iii) Has a maximum heat input capacity of 73 MW (250 million Btu/hour) or less.

[45CSR16, 40 C.F.R. § 60.43b (c), 45CSR13, R13-1843, B.11., (001-01)]

4.1.15. On and after the date on which the initial performance test is completed or is required to be completed under 40 C.F.R. § 60.8, whichever date comes first, no owner or operator of an affected facility that combusts coal, oil, wood, or mixtures of these fuels with any other fuels shall cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. Compliance with the streamlined opacity requirements in Section 4.1.2 [45CSR§2-3.1.] will assure compliance with 40 C.F.R. 60 Subpart Db.

[45CSR16, 40 C.F.R. § 60.43b (f), (001-01)]

4.1.16. The particulate matter and opacity standards apply at all times, except during periods of startup, shutdown or malfunction.

[45CSR16, 40 C.F.R. § 60.43b (g), (001-01)]

~~4.1.17. For purposes of Section 4.1.20 [40 C.F.R. § 60.44b (i)], the nitrogen oxide standards under this section apply at all times including periods of startup, shutdown, or malfunction.~~

~~**[45CSR16, 40 C.F.R. § 60.44b (h), (001-01)]**~~

Note for DAQ Consideration: This requirement may not be necessary due to the exemption in 40CFR60.44b(k) for units having a heat input of less than 250 MMBtu/hr.

4.1.18. Except as provided under 40 C.F.R. § 60.44b (j), compliance with the emission limits under this section is determined on a 30-day rolling average basis.

[45CSR16, 40 C.F.R. § 60.44b (i), (001-01)]

4.1.19. Compliance with the particulate matter emission standards under 40 C.F.R. § 60.43b shall be determined through performance testing as described in 40 C.F.R. § 60.46b (d).

[45CSR16, 40 C.F.R. § 60.46b (b), (001-01)]

- 4.1.20. Air pollutant emissions from the emission point, WoodFurn, serving the wood-waste fired furnace, Source ID 001-01, shall not exceed any of the following limitations:

Pollutant	Emission Rate (LB/hr)
Carbon Monoxide (CO)	41.0
Nitrogen Oxides (NO _x)	38.5
Particulate Matter (PM)	3.0
Sulfur Dioxide (SO ₂)	1.5
Volatile Organic Compounds (VOC)	4.5

This satisfies 45CSR§§2-4.1 and 4.1.b (Section 4.1.4) and 45CSR§§10-3.3 and 3.3.f (Section 4.1.9).

[45CSR13, R13-1843, A.9., (001-01)]

- 4.1.21. Air pollutant emissions from emission point, StandByFurn1, serving the Standby Furnace shall not exceed the following limitations:

Pollutant	Emission Rate (LB/hr)
Carbon Monoxide (CO)	1.39
Nitrogen Oxides (NO _x)	9.0
Particulate Matter (PM)	1.0
Sulfur Dioxide (SO ₂)	0.5
Volatile Organic Compounds (VOC)	1.86

This satisfies 45CSR§§2-4.1 and 4.1.b (Section 4.1.4) and 45CSR§§10-3.3 and 3.3.f (Section 4.1.9).

[45CSR13, R13-1843, A.12., (001-02)]

- 4.1.22. The wood-waste fuel feed rate to the furnace shall not exceed 25,550 pounds per hour or 111,930 tons per year.

[45CSR13, R13-1843, A.7., (001-01)]

- 4.1.23. The permittee shall not burn any washwater waste stream containing phenol-formaldehyde resin in the furnace. If the washwater waste stream is determined to be non-hazardous through a hazardous waste review then it may be burned in the furnace provided that the emission limits under Section 4.1.20 are not exceeded and formaldehyde emissions do not result from such burning.

[45CSR13, R13-1843, A.8., (001-01)]

- 4.1.24. The permittee shall burn no more than one (1) ton per month of non-hazardous waste oils, oily rags and adsorbent materials saturated with such oils. Said burning shall not result in emissions in excess of the limitations set forth in Section 4.1.20. The permittee shall perform a hazardous waste review on an annual basis to insure that routine procedures consistently produce non-hazardous waste materials. The results of these hazardous waste reviews shall be forwarded to the Director of the Division of Air Quality no later than thirty (30) days after a determination has been made. A Responsible Official shall certify said results to be accurate and true.

[45CSR13, R13-1843, A.13., (001-01)]

4.2. Monitoring Requirements

- 4.2.1. The owner or operator of a fuel burning unit(s) shall monitor compliance with 45CSR§2-3 as set forth in an approved monitoring plan (see Appendix) for each emission unit. Such monitoring plan(s) shall include, but not be limited to, one or more of the following: continuous measurement of emissions, monitoring of emission control equipment, periodic parametric monitoring, or such other monitoring as approved by the Director.
[45CSR§2-8.2.a.]
- 4.2.2. The owner or operator of an affected facility subject to the opacity standard under 40 C.F.R. § 60.43b shall install, calibrate, maintain, and operate a continuous monitoring system for measuring the opacity of emissions discharged to the atmosphere and record the output of the system.
[45CSR16, 40 C.F.R. § 60.48b (a), 45CSR13, R13-1843, B.8., (001-01)]
- 4.2.3. The continuous monitoring system shall meet the requirements of Performance Specification 1 found in 40 C.F.R. Part 60 Appendix B.
[45CSR13, R13-1843, B.9., (001-01)]
- 4.2.4. The procedures under 40 C.F.R. § 60.13 shall be followed for installation, evaluation, and operation of the continuous monitoring systems.
- (1) For affected facilities combusting coal, wood or municipal-type solid waste, the span value for a continuous monitoring system for measuring opacity shall be between 60 and 80 percent.
[45CSR16, 40 C.F.R. § 60.48b (e) (1), 45CSR13, R13-1843, B.8., (001-01)]
- 4.2.5. The permittee shall monitor visible emissions from 001-01 (Wood Fired Furnace) in accordance with the following procedures, test methods and frequencies:
- a. Monitoring of opacity from the 001-01 (Wood Fired Furnace) shall be accomplished by utilizing a continuous opacity monitoring system (COMS) in accordance with Sections 4.2.2 and 4.2.4.
- b. All visible emissions tests shall be conducted during operating conditions that have the potential to create visible emissions.
- c. If the observer is unable to conduct the tests due to unit downtime, visual interference's caused by other visible emission sources (e.g. fugitive emissions during high wind conditions), or due to weather conditions such as fog, heavy rain, or snow, the observer shall note such conditions on the data observation sheet and make at least three (3) attempts to conduct the tests at approximately 2-hour intervals throughout the day. The permittee shall attempt to make the observations daily until a valid observation period is completed.
[45CSR § 30-5.1.c., (001-01)]

4.3. Testing Requirements

- 4.3.1. The owner or operator of a fuel burning unit(s) shall demonstrate compliance with 45CSR§2-3 by periodic testing in accordance with 40 C.F.R. Part 60 Appendix A, Method 9, or a certified continuous opacity monitoring system, as approved by the Director, and 45CSR§2-4 by periodic particulate matter stack testing, conducted in accordance with the appropriate test method set forth in the Appendix to 45CSR2 or other equivalent EPA approved method approved by the Director. The owner or operator shall conduct such testing at a frequency to be established by the Director.
[45CSR§2-8.1.a., 45CSR13, R13-1843, B.2.]

- 4.3.2. As a result of overlapping testing requirements that will be implemented for the boiler MACT for annual PM and CO testing, Weyerhaeuser would like DAQ to consider removing the testing requirements below. Since CO will be a surrogate for VOCs we believe complete combustion will be assured via the CO requirements of the boiler MACT. Additionally, since the wood fired furnace is less than 250 MMBtu/hr it is exempt from the NO_x requirements of NSPS subpart Db and testing will not be necessary unless requested by the Director.

—The permittee shall conduct tests to determine compliance with the particulate matter (PM) emission limitations in Sections 4.1.20 (Wood Fired Furnace). The Methods listed below from Appendix A of 40 C.F.R. Part 60 shall be utilized for purposes of conducting performance tests, unless the Director approves an alternate or equivalent method. The Standby Furnace is exempt from CO and PM testing since the Standby Furnace combusts natural gas and its design heat input is less than 100 MMBtu/hr. Requirements shall be met with respect to submission of a test protocol and notification of testing.

<u>Pollutant</u>	<u>Method</u>
Nitrogen Oxides (NO _x)	7
Carbon Monoxide (CO)	10
Volatile Organic Compounds (VOC)	25 or 25A
Particulate Matter (PM)	5

Tests for nitrogen oxides (NO_x) were conducted in August of 2005, 2008, and 2010 for the Wood Furnace and resulted in mass emission rates between 50% and 90 % for each test. The results of those tests showed that the current nitrogen oxides (NO_x), and testing frequency is “Once/ 3 years.” A test for particulate matter (PM), carbon monoxide (CO), and Volatile Organic Compounds (VOC) was conducted in August of 2005 and 2010 resulted in mass emission rates ≤50%. The results of this test showed that the current particulate matter (PM), carbon monoxide (CO), and Volatile Organic Compounds (VOC) testing frequency is “Once/5 years.” Subsequent testing to determine compliance with the nitrogen oxides (NO_x), particulate matter (PM), carbon monoxide (CO), and Volatile Organic Compounds (VOC) limitations of Section 4.1.20 shall be conducted in accordance with the schedule set forth in the following table:

Tests for nitrogen oxides (NO_x) and Volatile Organic Compounds (VOC) were conducted in August of 2005 and 2010 for the Standby Furnace and resulted in mass emission rates ≤50% for each test. The results of those tests showed that the current nitrogen oxides (NO_x) and Volatile Organic Compounds (VOC) testing frequency is “Once/ 5 years.” Subsequent testing to determine compliance with the nitrogen oxides (NO_x) and volatile organic compounds (VOC) limitations of Section 4.1.21 shall be conducted in accordance with the schedule set forth in the following table:

Test	Test Results	Testing Frequency
Annual	If annual testing is required, after two successive tests indicate mass emission rates between 50% and 90 % NO _x , CO, PM, VOC limits	Once/3 years
Annual	If annual testing is required, after three successive tests indicate mass emission rates ≤50% of NO _x , CO, PM, VOC limits	Once/5 years
Once/3 years	If testing is required once/3 years, after two successive tests indicate mass emission rates ≤50% of NO _x , CO, PM, VOC limits	Once/5 years
Once/3 years	If testing is required once/3 years and any tests indicate mass emission rates between 50% and 90 % NO _x , CO, PM, VOC limits	Once/3 years
Once/3 years	If testing is required once/3 years and any test indicates a mass emission rate ≥90% of NO _x , CO, PM, VOC limits	Annual
Once/5 years	If testing is required once/5 years and any test indicates a mass emission rate ≤50% of NO _x , CO, PM, VOC limits	Once/5 years
Once/5 years	If testing is required once /5 years and any test indicates mass emission rates between 50% and 90 % of NO _x , CO, PM, VOC limits	Once/3 years

Once/5 years	If testing is required once/5 years and any test indicates a mass emission rate \geq 90% of NO _x , CO, PM, VOC limits	Annual
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[~~45CSR§30-5.1.e., 45CSR§2-8.1., 45CSR13, R13-1843, B.20., B.21., B.19., B.16., B.22.~~]

4.3.3. Continual compliance with the proposed emission limits for the Standby Furnace shall be demonstrated by using only natural gas or propane as fuel.
[45CSR§30-5.1.c., 001-02]

4.3.4. Continual compliance with the proposed emission limits for sulfur dioxide shall be demonstrated utilizing only wood-waste and other materials specified in this permit in the Wood Fired Furnace. Fuel quality reports for Wood Fired Furnace will be submitted annually and an initial characterization from each supplier of natural gas or propane is to be conducted for the Standby Furnace as required by 45CSR2 and 45CSR10.
[45CSR§30-5.1.c., 001-01 and 001-02]

4.3.5. The permittee shall demonstrate compliance with the carbon monoxide, nitrogen oxide, and VOC emissions limitations by monitoring and recording the following parameters for the Wood Fired Furnace. Unless different ranges for the parameters are established through testing Section 4.3.2, which demonstrate compliance with the carbon monoxide emission limitation, said parameters shall be maintained within the design specifications indicated below. If new parameters ranges are established through testing Section 4.3.2, the permit must be revised to reflect the new ranges, which will be relied on to, demonstrate compliance with the carbon monoxide emission limitation.

- i. Furnace exhaust oxygen content between 4% and 15% except during periods when the furnace is in an "idle" mode.
- ii. The oxygen content shall be recorded once every 12 hours while the unit is operating.
- iii. For the nitrogen oxides, the average firebox temperature shall not exceed 1900°F.
- iv. In the case of VOC's, the permittee may conduct an approved compliance test to demonstrate that the Wood Fired Furnace and Standby Furnace can operate in compliance with their emission limits with parameters outside the ranges specified in the compliance determination methods above or at production rates greater than the current limits.

[45CSR§30-5.1.c., 001-01 and 001-02]

4.3.6. For particulate matter emissions compliance, the permittee shall monitor and record the following parameters for the Wood Fired Furnace. Unless different ranges for the parameters are established through Section 4.3.2, which demonstrate compliance with the particulate matter emission limitation, said parameters shall be maintained within the design specifications indicated below. If new parameters ranges are established through Section 4.3.2, the permit must be revised to reflect the new ranges, which will be relied on to, demonstrate compliance with the particulate matter emission limitation.

- i. Operating voltages on the ESP of 20 to 60 Kilovolts.
- ii. Operating current on the ESP of 100 to 500 milliamps.
- iii. Monitored parameters will be recorded once every 24 hours when the unit is operating.

[45CSR§30-5.1.c., 001-01]

- 4.3.7. At such reasonable times as the Director may designate, the owner or operator of any fuel burning unit(s) may be required to conduct or have conducted tests to determine the compliance of such unit(s) with the emission limitations of section 4. Such tests shall be conducted in accordance with the appropriate method set forth in the Appendix to this rule or other equivalent EPA approved method approved by the Director. The Director, or his duly authorized representative, may at his option witness or conduct such tests. Should the Director exercise his option to conduct such tests, the operator will provide all necessary sampling connections and sampling ports located in such manner as the Director may require, power for test equipment, and the required safety equipment such as scaffolding, railings and ladders to comply with generally accepted good safety practices.
[45CSR§2-8.1.b., 001-02]
- 4.3.8. The Director, or his duly authorized representative, may conduct such other tests as he may deem necessary to evaluate air pollution emissions other than those noted in 45CSR§2-4.1.
[45CSR§2-8.1.c., 001-02]

4.4. Recordkeeping Requirements

- 4.4.1. The owner or operator of a fuel burning unit(s) shall maintain on-site all records of monitored data established in the monitoring plan pursuant to 45CSR§2-8.2.a. Such records shall be made available to the Director or his duly authorized representative upon request. Such records shall be retained on-site for a minimum of five years. Compliance with this requirement may be satisfied through compliance with the requirements of the approved 45CSR2 Monitoring Plan (see Appendix) submitted on August 26, 2001 and any amendments thereto.
[45CSR§2-8.3.a.]
- 4.4.2. The owner or operator shall maintain records of the operating schedule and the quantity and quality of fuel consumed in each fuel burning unit in a manner to be established by the Director. Such records are to be maintained on-site and made available to the Director or his duly authorized representative upon request. Compliance with this requirement may be satisfied through compliance with the requirements of the approved 45CSR2 Monitoring Plan (see Appendix) submitted on August 26, 2001 and any amendments thereto.
[45CSR§2-8.3.c.]
- 4.4.3. The owner or operator of an affected facility shall record and maintain records of the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for coal, distillate oil, residual oil, natural gas, wood, and municipal-type solid waste for the reporting period. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month.
[45CSR16, 40 C.F.R. § 60.49b (d), 45CSR13, R13-1843, B.12., 001-01]
- 4.4.4. For facilities subject to the opacity standard under 40 C.F.R. § 60.43b, the owner or operator shall maintain records of opacity.
[45CSR16, 40 C.F.R. § 60.49b (f), 45CSR13, R13-1843, B.12., 001-01]
- 4.4.5. All records required under this section shall be maintained by the owner or operator of the affected facility for a period of 2 years following the date of such record. Compliance with the streamlined retention of records requirement in Section 3.4.2 will assure compliance with this requirement.
[45CSR16, 40 C.F.R. § 60.49b (o), 45CSR13, R13-1843, B.12., Furnace (001-01)]
- 4.4.6. The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day.
[45CSR16, 40 C.F.R. § 60.48c (g), 001-02]

- 4.4.7. All records required under 40 C.F.R. § 60.48c shall be maintained by the owner or operator of the affected facility for a period of two (2) years following the date of such record. Compliance with the streamlined retention of records requirement in Section 3.4.2 will assure compliance with this requirement.

[45CSR16, 40 C.F.R. § 60.48c (i), 001-02]

- 4.4.8. Compliance with the requirements to submit data on operating schedules and the quality of fuel used in the Wood Fired Furnace and Standby Furnace from 45CSR2 and 45CSR10 shall be demonstrated as described below:

1. The owner or operator of a fuel burning unit(s) shall maintain records of the operating schedule for each unit. Such records shall include, but may not be limited to the date and time of start-ups and shutdowns. Said records shall be maintained on site and shall be made available to the Director or his/her duly authorized representative upon request.

[001-01 and 001-02]

2. The owner or operator of a fuel burning unit(s) that burns gaseous fuel, liquid fossil fuel, or wood shall maintain records of the quantity of fuel burned in such units on a monthly basis. Said records shall be maintained on site and shall be made available to the Director or his/her duly authorized representative upon request.

[001-01 and 001-02]

3. The owner or operator of a fuel burning unit(s) that burns gaseous fuels shall maintain records on the quality of fuel burned in such units. Said records shall include, but not necessarily be limited to, the ash, sulfur, moisture, volatile matter, and BTU content of the fuel consumed. Such requirement for determining quality of fuel consumed shall be satisfied by an initial characterization of the fuel for each fuel supplier. Those records shall be maintained on site and shall be made available to the Director or his/her duly authorized representative upon request.

[001-02]

4. The owner or operator of a fuel burning unit(s) which burns wood shall maintain records of the quality of fuel burned in such units. Said records shall include, but not necessarily be limited to, the ash, sulfur, moisture, volatile matter, and BTU content of the fuel consumed. The quality of fuel consumed in such units shall be determined annually. Those records shall be maintained on site and shall be made available to the Director or his/her duly authorized representative upon request.

[001-01]

[45CSR § 30-5.1.c.]

- 4.4.9. Continual compliance with the PM emission limitations for the Standby Furnace shall be demonstrated by maintaining records of fuel usage.

[45CSR § 30-5.1.c., 45CSR13, R13-1843, B.17., 001-02]

- 4.4.10. Compliance with disposal requirements for specified process-related waste materials via combustion in the Wood Fired Furnace (001-01) shall be determined by recording and maintaining the following information at the permitted facility for a period of five (5) years, and made available to the Director of the Division of Air Quality, his/her designated representative, upon request:

- a. Amounts of wood waste (Section 4.1.22) charged to Wood Fired Furnace to be combusted as fuel in the Wood Fired Furnace (001-01) shall be recorded on a daily basis and totaled per calendar month. Hourly usage shall be back calculated using actual hours of operation. Annual usage shall be determined on a 12-month rolling total.

- b. A hazardous waste characterization for the washwater waste (Section 4.1.23) shall be conducted on an annual basis to determine that no phenol-formaldehyde resin is present for disposal via combustion. Unless a change is realized and then semi-annual testing would be required until approval of annual testing is granted by the Director or his or designee. The characterization method and results of such determination is to be forwarded to the Director of the Division of Air Quality no later than thirty (30) days after determination has been made. A Responsible Official shall certify said results to be accurate and true.
- c. If the permittee burns non-hazardous waste oils, oily rags and adsorbent materials saturated with such oils (Section 4.1.24), the shall determine the amounts and types of non-hazardous wastes (oils, rags, adsorbents, etc.) charged to Wood Fired Furnace to be combusted shall be recorded on a daily basis and totaled at the end of each calendar month. Hourly charge rates shall be back calculated using actual hours of operation. Annual usage shall be determined on a 12-month rolling total.

[45CSR§30-5.1.c., 001-01]

4.5. Reporting Requirements

- 4.5.1. The owner or operator shall submit a periodic exception report to the Director, in a manner and at a frequency to be established by the Director. Such exception report shall provide details of all excursions outside the range of measured emissions or monitored parameters established in an approved monitoring plan, and shall include, but not be limited to, the time of the excursion, the magnitude of the excursion, the duration of the excursion, the cause of the excursion and the corrective action taken.

[45CSR§2-8.3.b.]

- 4.5.2. The owner or operator of any affected facility in any category listed in Section 4.5.2 (1) or (2) [40 C.F.R. § 60.49b (h) (1) or (2)] is required to submit excess emission reports for any excess emissions, which occurred during the reporting period.
 - (1) Any affected facility subject to the opacity standards under 40 C.F.R. § 60.43b (e) or to the operating parameter monitoring requirements under 40 C.F.R. § 60.13 (i) (1).
 - (2) Any affected facility that is subject to the nitrogen oxides standard of 40 C.F.R. § 60.44b, and that
 - (i) Combusts natural gas, distillate oil, or residual oil with a nitrogen content of 0.3 weight percent or less, or
 - (ii) Has a heat input capacity of 73 MW (250 million Btu/hour) or less and is required to monitor nitrogen oxides emissions on a continuous basis under 60.48b (g) (1) or steam generating unit operating conditions under 40 C.F.R. § 60.48b (g) (2).
 - (3) For the purpose of 40 C.F.R. § 60.43b, excess emissions are defined as all 6-minute periods during which the average opacity exceeds the opacity standards under Section 4.1.15 [40 C.F.R. § 60.43b (f)].
 - (4) For purposes of 40 C.F.R. § 60.48b (g) (1), excess emissions are defined as any calculated 30-day rolling average nitrogen oxides emission rate, as determined under 40 C.F.R. § 60.46b (e), which exceeds the applicable emission limits in 40 C.F.R. § 60.44b.

[45CSR16, 40 C.F.R. § 60.49b (h), 45CSR13, R13-1843, B.12., 001-01]

- 4.5.3. The reporting period for the reports required under 40 C.F.R. Part 60 Subpart Dc is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.

[45CSR16, 40 C.F.R. § 60.48c (j), 001-02]

4.6. Compliance Plan

- 4.6.1. None

APPENDIX

45CSR2 Monitoring Plan

- ☐ **Wood Fired Boiler 4 (116 MMBtu/hr)**



Division of Air Quality
7012 MacCorkle Avenue, SE
Charleston, WV 25304-2943
Telephone Number: (304) 926-3647
Fax Number: (304) 926-3739

West Virginia Department of Environmental Protection

Bob Wise
Governor

Michael O. Callaghan
Secretary

August 30, 2001

Curtis Rhodes, Jr.
Trus Joist
100 TJM Drive
Buckhannon, WV 25201

RE: ID #097-00029
45 CSR 2 and 45 CSR 10 Compliance Plan


ID No. 097-00029 Reg. 2+10
Company Trus Joist
Facility Buckhannon Region 08
Initials SKC

Dear Mr. Rhodes

The Division of Air Quality (DAQ) is pleased to inform you that the West Virginia Air Regulation 2A & 10A Monitoring Plan, submitted pursuant to 45 CSR 2 and 45 CSR 10 for the Trus Joist Plant located in Buckhannon, WV has been approved as submitted.

Should you have any questions or require additional information, please contact Laura Crowder of my staff at (304) 926-3647.

Approved:


John C. Benedict, Deputy Director
Division of Air Quality

Date: 3J-0j

NON-CONFIDENTIAL

"To use all available resources to protect and restore West Virginia's environment in concert with the needs of present and future generations."

11 West Virginia
..... "!"= Protection



April 26, 2001

Ms. Laura Crowder
WV Office of Air Quality
7012 MacCorkle Avenue SE
Charleston, WV 25304

Re: 45CSR2 & 45CSR10 Monitoring Plans

Dear Laura:

In accordance with Section 8.2.a. of 45CSR2, I am enclosing the required monitoring plan for the wood-fired furnace in operation at the Buckhannon Facility. Since the boilers combust wood and natural gas, each are exempt from the testing, monitoring, recordkeeping and reporting requirements established in subsection 10.3 of 45CSR10.

Should you have any questions concerning the enclosed monitoring plan, please call me at (304)-472-8564 Ext. 244.

Sincerely,

Curtis R. Rhodes, Jr.
Plant Engineer

45CSR2 Monitoring Plan

Emission Unit Description:

- 116 MMBtu/hr Geka Thermal Systems (GTS) Wood-Fired Furnace
- 40 MM Btu/hr Gordon Piatt Natural Gas-Fired Back-Up Furnace (Exempt per 45-2-8.4.b. and 45-2-8.4.c.)

Monitoring Plan:

Weyerhaeuser Buckhannon Facility will comply with the requirement for a monitoring plan as specified in section 8.2.a. of 45CSR2 by the operation of a Continuous Opacity Monitor (COM). Under Section 8.2.a.1. of 45CSR2 the operation of a COM is deemed to satisfy the requirement for the aforementioned monitoring plan.

Monitored Data:

The following data are recorded, kept on-site and available for review:

- Chart recordings from the COM
- COM calibration records
- Filter disc calibration
- Quarterly COM reports
- COM maintenance records
- COM downtime reports
- Fuel usage records
- Fuel quality analysis

Associated Permits:

Weyerhaeuser Buckhannon Facility currently operates under Title V Operating Permit (R30-09700029) and construction permit (R13-1843B). Weyerhaeuser was required in both permits to install and operate a COM as specified in 40 CFR 60 Subpart Db.



Lance Miller
Mill Manager
Buckhannon Plant
41 TJM Drive
Buckhannon, WV 26201
Phone (304) 472-8564
Fax (304) 472-7395

Sept. 10, 2015

Mr. William F. Durham, Director
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

**WEYERHAEUSER NR COMPANY
BUCKHANNON FACILITY
R30-09700029-2011**

Request for Boiler MACT Compliance Extension – NESHAP 40 CFR 63.6(i)

Director Durham:

The Weyerhaeuser NR Company – Buckhannon facility (“Weyerhaeuser”) is a manufacturer of engineered lumber products located in Buckhannon, West Virginia. The site operates two sources subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (Boiler MACT), found in 40 CFR 63, Subpart DDDDD. One source is a wood-fired furnace/boiler (WoodFurn – Emission Unit ID #001-01) and the other source is a gaseous fuel process heater (StandByFurn1 – Emission Unit ID #001-02). Under the provisions established in 40 CFR 63.6(i), Weyerhaeuser is submitting this request for a one-year extension of the current compliance deadline of January 31, 2016 for its wood-fired unit (Emission Unit ID #001-01). The new compliance deadline would be the later of January 31, 2017, or a new date if any should be established for the rule.

Weyerhaeuser has submitted extension requests in several states where we have manufacturing operations. Some states have opted to approve extensions for the entire Boiler MACT standard, while others have issued extensions only for specific elements (e.g., 40 CFR 63.7555(d)) where additional time is needed. The Buckhannon facility can comply with either approach.

The Buckhannon site has completed work to enable the facility to comply with most of the applicable standards, work practices, and operating limits outlined in Tables 2, 3, and 4 to Subpart DDDDD of Part 63. These include the standards for particulate matter (PM), opacity, and carbon monoxide (CO). However, the facility has two areas of concern related to the work practice standards for startup and monitoring requirements, both areas of which are subject to EPA reconsideration work whose outcome will not be known before the fall of 2015.

The final Boiler MACT rule (as amended January 31, 2013) requires that subject boilers be started on one or a combination of listed fuels identified by the regulation as “clean fuels”, and that when biomass solid fuel is introduced, the control equipment be engaged (see Section 5 of Table 3, Subpart DDDDD). The Buckhannon boiler is not currently capable of firing any of the listed clean fuels to start the unit. Instead, the boiler is started on biomass fuel (green chips/bark) and therefore would be required to engage its ESP concurrent with the start of biomass fuel feed. This start-up scenario poses both a safety and functional risk in the ESP. EPA has acknowledged the safety and operational concerns and has attempted to address them in its proposed Boiler MACT Reconsideration rule¹. EPA is considering adding “dry biomass” to the list of “clean fuels” that can be used for start-up without the engagement of the control equipment.

If the final reconsideration rule does not include alternatives to the current rule, the site will have to implement a system to heat and dry the ESP prior to powering up the electrical fields. One option would be to design and install a gas-fired duct burner used only for heating up the ESP prior to powering it up. This would allow the ESP to be engaged before or coinciding with firing biomass solid fuel into the boiler. EPA is considering adding ESPs to the list of control devices that need to be engaged “as soon as possible” rather than within one hour. However, the outcome of the reconsideration process needs to be known before making commitments to install a preheating system for the ESP.

Our second concern stems from new additional monitoring requirements EPA proposed in the Reconsideration rule that, if finalized, will add significant instrumentation and programming requirements for the mill during startup events. These requirements appear in 40 CFR 63.7555(d). The new monitoring requirements include hourly steam/thermal oil temperature, hourly flue gas temperature, and each ESP field’s secondary voltage and current.

¹ 80 Federal Register 3090; January 21, 2015

Weyerhaeuser through its industry trade groups has provided comments to EPA regarding these matters and is awaiting EPA's final rule to understand our actual options for start up and what items need to be monitored to demonstrate compliance. EPA is considering changes to the start up definition that will allow four hours before control equipment is engaged and that the clock starts when "useful thermal energy" is provided to the process. EPA is also considering changes to the shutdown definition.

For both of these areas of concern (i.e., the requirements appearing in Section 5 of Table 3, and 40 CFR 7555(d)), we believe it would be premature for the Buckhannon facility to spend capital on equipment and monitoring systems to meet the current compliance deadline when that equipment and infrastructure may not be required after EPA completes its rulemaking later this year. We expect the final rule will identify other, more feasible alternatives that can be evaluated. Because EPA is not expected to complete its reconsideration work before September 2015, insufficient time will remain prior to the January 31, 2016 deadline to evaluate, select and implement solutions for the startup fuel and monitoring requirements at Buckhannon. This is the basis for our extension request.

Section 112(i)(3)(B) the Clean Air Act (CAA) gives the WVDEP-DAQ the authority to grant existing sources extensions of up to one year to comply with NESHAPs if needed for the installation of controls on a case-by-case basis. As EPA has previously explained in promulgating amendments to the compliance extension rule, "installation of controls" is not limited to the installation of "control equipment"; rather, the extension "is available for adding controls and other control measures requiring time beyond that which we (EPA) anticipated in establishing the (MACT) compliance date."²

"Other compliance measures" for which EPA said a compliance extension may be appropriate include obtaining or implementing technology hardware or software systems and process changes to accommodate pollution prevention or other emission reduction measures.³ EPA also said that other factors that could contribute to compliance delay and support an extension request include "shortage of skilled design and construction engineers who are needed to build new facilities to meet relevant standards, as well as shortages of available technology to meet the demand from sources who must comply with the industry-specific MACT requirements."


² 66 Federal Register 16318, 16328

³ 66 Federal Register 16328

Please provide written confirmation of your approval of this request. Consistent with 40 CFR 63.6(i)(4)(i)(A), please incorporate your approval of the extension into the facility's Title V permit.

If you have any questions or concerns about the information presented in this request, please contact Buckhannon's Environmental Manager, Matthew Rutherford at 304-473-5407.

Regards,



Lance Miller
Mill Manager
Weyerhaeuser NR Company

41 TJM Drive
Buckhannon, WV 26201
Tel (304) 472-8564
Fax (304) 472-7395

September 15, 2015

Attn: Mr. William F. Durham, Director
WVDEP – Division of Air Quality
601 57th St., SE
Charleston, WV 25304

Attn: Director, Air Protection Division
US EPA – Region III
Mail Code 3AP00
1650 Arch St.
Philadelphia, PA 19103-2029

**RE: Boiler MACT Notification of Compliance Status
Weyerhaeuser NR – Buckhannon Facility
Title V Permit No. R30-09700029-2011**

Director,

Weyerhaeuser's Buckhannon, WV Facility is a major source of hazardous air pollutants (HAP), as defined in 40 CFR Part 63, Subpart A. As a consequence, the Buckhannon Facility is subject to the following newly promulgated standard:

40 CFR Part 63, Subpart DDDDD

National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (76 Federal Register 15608, March 21, 2011; 78 Federal Register 7138, January 31, 2013 and as revised at 80 Federal Register 3090, January 21, 2015)

This standard is commonly referred to as the "Boiler MACT". The purpose of this letter is to satisfy the Boiler MACT Notification of Compliance Status requirements as specified in 40 CFR §63.7545(e)(1-8) and §63.9(h)(2)(ii). The facility is required to conduct an initial compliance demonstration as specified in §63.7530(a).

The Buckhannon Facility is owned by Weyerhaeuser NR Company with corporate offices in Federal Way, Washington. Relevant addresses and telephone numbers are as follows:

Facility Owner:	Weyerhaeuser NR Company
Shipping Address:	33663 Weyerhaeuser Way South Federal Way, WA. 98003
Mailing Address:	PO Box 9777 Federal Way, WA 98063-9777
Phone number:	(253) 924-2345

Facility Location: 41 TJM Drive
Buckhannon, WV 26201

The primary contacts at the Facility are:

Mill Manager: Lance Miller
(Responsible Official) Phone: (304) 473-5490

Facility Environmental Contact: Matthew Rutherford
Phone: (304) 473-5407

The Buckhannon Facility has two sources subject to the Boiler MACT standards:

One source is the wood fired furnace/process heater (WoodFurn – Emission Unit ID #001-01) with a designed heat input capacity of 116 MMBtu/hr that burns a mixture of wet cellulosic biomass and dry resinated wood sawdust. Products of combustion exiting the WoodFurn enter a 50-tube multi-clone collector designed to remove approximately 70 percent of the particulate from the flue gas. The flue gas then enters directly into a dry electrostatic precipitator designed to remove over 93 percent of the remaining particulate. Over-fire and under-fire air, firebox temperature, and fuel feed are monitored remotely through a programmable logic controller (PLC) system to ensure complete combustion and minimize CO and NOx emissions. The WoodFurn operates year round. The primary purpose of the WoodFurn is to produce heat energy for the thermal oil system that is used in various processes throughout the mill. The listed subcategory for this source is stokers/sloped grate/others designed to burn wet biomass fuel. Per 40 CFR§241, the cellulosic biomass is a traditional fuel and the resinated wood is a Categorical non-waste.

WoodFurn will comply with the CO emission limit of 1,500 ppm, PM emission limit of $3.7\text{E-}02$ lb per MMBtu of heat input, HCl emission limit of 0.022 lb per MMBtu of heat input, and mercury emission limit of $8.6\text{E-}07$ lb per MMBtu of heat input. An O2 trim system will be utilized to demonstrate continuous compliance with the O2 operating limit. Emission testing and maintaining the fuel type/rates will be used to demonstrate compliance with the HCl and mercury limits. A continuous opacity monitoring system (COMS) will be used to demonstrate continued compliance with PM. Annual tune-up of this unit will be conducted to meet the work practice standard in the Boiler MACT. The facility does not plan to demonstrate compliance by emission averaging nor by using efficiency credits through energy conservation. Enclosed are Tables 2-12 and 2-13 of the initial performance test conducted on July 16 and 17, 2015. Full test report for Boiler MACT performance testing and Title V compliance testing was submitted to WVDEP-DAQ on August 27, 2015. Performance test average results show CO at 20.67 ppm, PM of $7.0\text{E-}04$ lb per MMBtu of heat input as calculated, HCL of $3.0\text{E-}05$ lb per MMBtu of heat input, and mercury of $2.45\text{E-}07$ lb per MMBtu of heat input.

5.7×10^{-6} lb Technical Correction
Limit originally
pulled from
new source Table

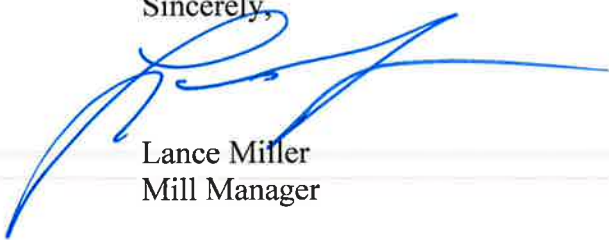
The other source is a gaseous fuel process heater (StandByFurn1 – Emission Unit ID #001-02) with a designed heat input capacity of 40 MMBtu/hr while firing natural gas or propane and is permitted to operate 24 hours per day, seven days per week, and 52 weeks per year. The listed subcategory for this source is units designed to burn gas 1 fuels. No performance testing is required for the StandByFurn1 auxiliary heater and no emissions monitoring is required because the unit is fired on natural gas. No pollution control equipment is required for this source. Annual tune-up of this unit will be conducted to meet the work practice standard in the Boiler MACT. Per 40 CFR§241, natural gas is a traditional fuel.

The Buckhannon Facility does not plan to demonstrate compliance by emission averaging nor by using efficiency credits through energy conservation. This facility complies with the required initial tune-up according to the procedures in §63.7540(a)(10)(i) through (vi). Initial tune-ups were performed on both sources on July 8, 2015. Documentation of the initial tune-up for each unit is kept on file at the facility. The facility has had an energy assessment performed according to §63.7530(e). No secondary materials that are solid waste were combusted in any affected unit. There has been no deviation from any emission limit, work practice standard, or operating limit.

If you have any questions on this matter, please do not hesitate to contact me or Matthew Rutherford at (304) 473-5407.

I do hereby certify that the Buckhannon Facility has met all applicable emission limits and work practice standards.

Sincerely,



Lance Miller
Mill Manager

Enclosure:

Tables 2-12 and 2-13, Montrose Air Quality Services Project #215111



Table 2-12
Emissions Summary

Test Performed For:	Weyerhaeuser NR Company	Testing Performed By:
	Buckhannon, WV	Montrose Air Quality Services
Source(s) Tested:	Wood-Fired Furnace	Project Manager:
Test Condition:	Compliance	Mr. Tim Draheim
Test(s) Performed:	Particulate, Hydrogen Chloride, and Gas Testing	

Run Number		Run 1	Run 2	Run 3	Average	
Date of Run		7/16/15	7/16/15	7/17/15		
Emission Test Run Time Began - Ended		1104-1306	1412-1805	0800-1007		
Stack Oxygen Concentration	%(dry)	10.90	11.00	11.20	11.03	
¹ Firebox Oxygen Concentration	%(wet)	9.42	10.06	10.00	9.83	
Carbon Dioxide Concentration	%(dry)	9.60	9.70	9.50	9.60	
Sulfur Dioxide Concentration	ppm(dry)	0.20	0.10	0.30	0.20	
Nitrogen Oxides Concentration	ppm(dry)	88.40	83.10	93.00	88.17	
Carbon Monoxide Concentration	ppm(dry)	23.70	15.00	23.30	20.67	
Total Hydrocarbon Concentration, as propane	ppm(wet)	0.30	<0.10	0.20	0.20	
Hydrogen Chloride Concentration	ppm(dry)	0.01	0.02	0.02	0.02	
Isokinetic Sampling Rate	%	103.29	97.92	98.38	99.86	
Stack Temperature	°F	489	491	484	488	
Slack Temperature	°C	254	255	251	253	
Moisture Content	% volume	14.24	14.30	14.18	14.24	
Heat Input	mmBtu/Hr	121.88	112.78	108.22	114.29	
Stack Gas Velocity	f/s	47.02	44.07	42.81	44.63	
Stack Gas Flow @ Actual Conditions	acfm	79,774	74,760	72,620	75,718	
Stack Gas Flow @ Standard Conditions	scfm	42,691	39,931	39,052	40,558	
Stack Gas Flow @ Dry Standard Conditions	dscfm	36,612	34,219	33,514	34,782	Permit Limits
Particulate Concentration, Filterable	gr/dscf	0.0003	0.0004	0.0002	0.0003	
Particulate Emissions, Filterable	lb/hr	0.08	0.11	0.06	0.08	3.0
Hydrogen Chloride Emissions	lb/MMBtu (Heat Input)	0.00002	0.00003	0.00003	0.00003	0.022
Hydrogen Chloride Emissions	lb/hr	0.003	0.003	0.003	0.003	
Sulfur Dioxide Emissions	lb/hr	0.07	0.03	0.10	0.07	1.5
Nitrogen Oxides Emissions	lb/hr	23.20	20.38	22.34	21.98	38.5
Carbon Monoxide Emissions	lb/hr	3.79	2.24	3.41	3.14	41.0
Total Hydrocarbon Emissions, as propane	lb/hr	0.09	0.03	0.05	0.06	4.5
<p>The average lb/hr Filterable Particulate emissions from this source were below the applicable standards.</p> <p>The average Hydrogen Chloride lb/MMBtu (Heat Input) emissions from this source were below the applicable standards.</p> <p>The average Sulfur Dioxide lb/hr emissions from this source were below the applicable standards.</p> <p>The average Nitrogen Oxides lb/hr emissions from this source were below the applicable standards.</p> <p>The average Carbon Monoxide lb/hr emissions from this source were below the applicable standards.</p> <p>The average Total Hydrocarbon lb/hr emissions from this source were below the applicable standards.</p>						

¹Test Note: Measured at the outlet of the firebox using the facility's continuous online oxygen analyzer.



Table 2-13
Emissions Summary - Mercury

Test Performed For: Weyerhaeuser NR Company
Buckhannon, WV.

Testing Performed By:
Montrose Air Quality Services

Source(s) Tested: Wood-Fired Furnace

Project Manager:

Test Condition: Compliance

Mr. Tim Draheim

Test(s) Performed: Method 30B - Mercury Determination

Run Number		1A	1B	2A	2B	3A	3B	Average	Permit Limit
Date of Run	mm/dd/yr	7/16/15	7/16/15	7/16/15	7/16/15	7/17/15	7/17/15	-	
Emission Test Run Time Began	Military Time	11:04	11:04	14:12	14:12	8:00	8:00	-	
Emission Test Run Time Ended	Military Time	12:04	12:04	15:12	15:12	9:00	9:00	-	
Average Concentration and Emissions of Spike and Unspiked Traps Per Run									
Total Mercury Concentration	ug/dscm	0.166		0.212		0.215		0.213	
Total Mercury Emissions	lb/hr	2.28E-05		2.72E-05		2.70E-05		2.71E-05	
Total Mercury Emissions	lb/mmBtu (Heat Input)	1.87E-07		2.41E-07		2.50E-07		2.45E-07	8.6E-07
The average lb/mmBtu of Heat Input Mercury emissions from this source were below the applicable standards.									
Test Note: Run 1 did not meet EPA Method 30B breakthrough requirements. Run 1 results are not included in the overall average of this test.									