

Fact Sheet



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

Permit Number: **R30-02300023-2022**
Application Received: **July 2, 2021**
Plant Identification Number: **03-54-023-00023**
Permittee: **Allegheny Wood Products International, Inc.**
Facility Name: **Plant #4**
Mailing Address: **P.O. Box 130, Petersburg, WV 26847**

Physical Location: Petersburg, Grant County, West Virginia
UTM Coordinates: 660.476 km Easting • 4316.993 km Northing • Zone 17
Directions: From the intersection of US Route 220 and State Route 28 in Petersburg, follow US Route 220 South to Johnson Run Road (220/2) Turn right onto Johnson Run Road and continue for 1.3 miles to Airport Road. Turn right onto Airport Road. Plant #4 is the first facility on the right.

Facility Description

Allegheny Wood Products International, Inc. Plant #4 is a lumber/wood products facility covered by Standard Industrial Classification (SIC) 2421. The plant 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 operates a dry kiln facility, a sawing and planing facility, and processes scrap wood to be used as fuel for the two boilers. There are thirteen (13) drying kilns at the facility that operate with steam heat generated from the boilers and which have no emissions associated with their operation.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2020 Actual Emissions
Carbon Monoxide (CO)	180.55	109.48
Nitrogen Oxides (NO _x)	16.65	4.22
Particulate Matter (PM _{2.5})	10.21	0.66
Particulate Matter (PM ₁₀)	17.03	4.34
Total Particulate Matter (TSP)	72.71	13.18
Sulfur Dioxide (SO ₂)	2.49	0.44
Volatile Organic Compounds (VOC)	9.52	0.67
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2020 Actual Emissions
Total HAPs	0.83	0.20

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

Title V Program Applicability Basis

This facility has the potential to emit 181 tons per year of CO. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Allegheny Wood Products International, Inc.'s Plant #4 is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:

45CSR2	To Prevent And Control Particulate Air Pollution From Combustion Of Fuel In Indirect Heat Exchangers
45CSR6	Control Of Air Pollution From Combustion Of Refuse
45CSR7	To Prevent And Control Particulate Matter Air Pollution From Manufacturing Processes And Associated Operations
45CSR10	To Prevent And Control Air Pollution From The Emission Of Sulfur Oxides
45CSR11	Prevention Of Air Pollution Emergency Episodes
45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
45CSR16	Standards of Performance for New Stationary Sources
45CSR30	Requirements For Operating Permits
45CSR34	Emission Standards For Hazardous Air Pollutants

40 C.F.R. Part 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
40 C.F.R. Part 61, Subpart M	National Emission Standard For Asbestos
40 C.F.R. Part 63, Subpart JJJJJ	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
40 C.F.R. Part 64	Compliance Assurance Monitoring
40 C.F.R. Part 82, Subpart F	Recycling and Emissions Reduction
WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.

State Only:

45CSR4	To Prevent And Control The Discharge Of Air Pollutants Into The Open Air Which Causes Or Contributes To An Objectionable Odor Or Odors
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Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit <i>(if any)</i>
R13-1869C	November 8, 2017	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

This is a renewal of the Title V permit which was issued on January 4, 2017 and last modified on January 23, 2018. Significant changes to the most recent version of the Title V Permit consist of the following:

Title V Boilerplate changes

- **Conditions 3.5.3.** - Updated US EPA reporting information

Non-Applicability Determinations

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

45CSR§§2-4,5,6,8 and 9	Boiler #1 is under 10 mmBTU/hr and exempt from these sections per 45CSR§2-11. However, failure to attain acceptable air quality in parts of some urban areas may require mandatory control at a later date.
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45CSR§§2-8.1.a. and 8.2.	Boiler #1 and boiler #2 each have a design heat input less than 100 mmBtu/hr; therefore, the boilers are exempt per 45CSR§2-8.4.c.
45CSR§10-3, 6, 7, and 8.	Boiler #1 is under 10 mmBTU/hr and exempt from these sections per 45CSR§10-10.1. However, failure to attain acceptable air quality in parts of some urban areas may require mandatory control at a later date.
45CSR§10-8.	Both boilers combust wood alone and are exempt from this section per 45CSR§10-10.3.
45 CSR§7-3.7.	The only storage structure potentially subject to this section of 45CSR7 is the storage bin which holds the wood waste fuel for the boilers. The bin is considered to be part of the fuel burning unit and is subject to the requirements of 45CSR2 and exempt from 45CSR7 requirements per 45CSR§7-10.
40 C.F.R. 60 Subpart Db	The standby boiler #1 and main boiler #2 are exempt because they are less than 100 MMBTU/hr.
40 C.F.R. 60, Subpart Dc* <i>*Except §60.40c, §60.41c and §60.48c.</i>	The main boiler #2 is not subject to the SO ₂ and PM standards because it is under 30 mmBtu/hr heat input. It is, however, subject to the fuel recording provision. The standby boiler #1 is under 10 MMBtu.hr heat input and is therefore exempt from this subpart.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: April 12, 2022

Ending Date: May 12, 2022

Point of Contact

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

Frederick Tipane
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41910
frederick.tipane@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Not applicable.