

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on May 30, 2019.

Permit Number: **R30-06700095-2019**
Application Received: **June 30, 2023**
Plant Identification Number: **03-54-06700095**
Permittee: **JELD-WEN, Inc. dba JELD-WEN**
Facility Name: **JELD-WEN, Wood Fiber Division**
Mailing Address: **500 Jeld-Wen Road, Craigsville, WV 26205**

Permit Action Number: *MM01* Revised: *October 11, 2023*

Physical Location:	Craigsville, Nicholas County, West Virginia
UTM Coordinates:	529.8 km Easting • 4,243.8 km Northing • Zone 17
Directions:	From US-19 North of Summersville, take Route 55 East. Approximately 12 miles from Route 19, turn left on Columbia Forest Products Access Road. Stay left on Jeld-Wen Road.

Facility Description

The JELD-WEN, Wood Fiber Division facility manufactures door skins in a process similar to the hardboard manufacturing process. The fiber-containing material, or furnish, consists of green poplar chips. The furnish is mechanically separated into fiber by the refiner and is then dried in a tube dryer. Next, the fiber is blended with a “no added formaldehyde” resin, and a fiber mat is formed. The mat continues into a cold pre-compressor, which is followed by trimming operations. The mat is then consolidated in a steam-heated press. After the press, the door skins are cut to the final dimensions and painted with waterborne primer.

A wood-fired boiler burns residuals from the production process, as well as purchased hogged-fuel, to generate steam. Additional combustion sources include a natural gas-fired back-up boiler and natural gas heated ovens associated with the priming operations. The fiber dryer is heated by both steam and natural gas (direct-fired).

This minor modification incorporates the revisions made with the Class II Administrative Update R13-2192R. The modification allows the permittee to produce a new adhesive and a new paint in addition to the products currently permitted under the existing emission unit DC2. Collectively, the adhesive and paint products manufactured at the facility will be referred to as coatings. Prior to this permit revision, emission unit DC2 only produced paint products which were both sold externally and consumed at the facility to coat wood fiber door skins. The new adhesive and paint products will not be used at the facility.

SIC: Primary 2493, Secondary 2851; NAICS: 321219, 325500

Emissions Summary

The facility's potential emissions have not changed due to this minor modification.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 172.78 tpy of nitrogen oxides (NOX) and 155.61 tpy of volatile organic compounds (VOCs). Due to this facility's potential to emit over 100 tons per year of criteria pollutant, JELD-WEN, Inc. dba JELD-WEN is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

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

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

Federal and State:	45CSR7	To Prevent and Control Particulate Matter Air Pollution From Manufacturing Processes and Associated Operations.
	45CSR13	NSR Permit Requirements.
	45CSR30	Operating Permit Requirements.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

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

Active Permits/Consent Orders

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance
R13-2192R	August 08, 2023

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

Determinations and Justifications

This minor modification incorporates the revisions made with the Class II Administrative Update R13-2192R. The modification allows the permittee to produce additional coatings in emission unit DC2 (Emission Point: E15). The new coatings are the adhesive JELD-WEN Door Lay-up Glue (8-007-X-19) and the paint PFL Architectural Paint (6-019-A-18).

The raw materials used in the coating production fall into the same categories referenced in the current operating permit, there will be no changes made to the current process or to existing equipment for the additional processing, and neither of the new products are to be used at the facility. The change in potential emissions is insignificant, and the emission limits associated with emission point E15 have not increased as a result of this permit revision.

As a result of this minor modification, the following changes have been made to the operating permit:

1. Section 1.0. – Emission Units Table

- a. As “coating” is being used to denote the paint and adhesive products, the descriptions for certain emission units have been updated as follows:
 - i. The description for emission unit DC2 has been changed from “Paint Manufacturing” to “Coating Manufacturing”.
 - ii. The descriptions for emission units ST4 and ST5 have been changed from “Latex Storage Tank” to “Coating Raw Material Storage Tank”.
 - iii. The descriptions for emission units ST6 through ST9 have been changed from “Paint Storage Tank” to “Coating Storage Tank”.
- b. The design capacities of storage tanks ST5 and ST9 have also been corrected in accordance with R13-2192R.
- c. The Active R13, R14, and R19 Permits table has been updated with R13-2192R which was issued on August 08, 2023.

2. Section 2.0. – General Conditions

- a. In Condition 2.1.3., the reference to 45CSR§30-2.12. has been replaced with 45CSR§30-2.39 which defines “Secretary”.
- b. The authority of Condition 2.11.4. has been updated to 45CSR§30-2.40. due to a change in 45CSR30.
- c. Section 2.17., which previously contained emergency requirements, has been removed from the permit and replaced with “Reserved” as the requirements for emergencies and affirmative defense were removed from 45CSR30.
- d. The authority of Condition 2.22.1. has been updated to 45CSR§30-5.3.e.3.B. due to the repeal of Rule 45CSR38 by Senate Bill No. 163.

3. Section 3.0. – Facility-Wide Requirements

- a. Condition 3.5.3. has been updated to show changes that have been made to the U.S. EPA designee/address.
- b. 45CSR§30-8 has been revised and no longer requires the submission of certified emissions statements. Condition 3.5.4. has been updated accordingly.

- c. The requirements of Conditions 3.5.7. and 3.5.8.a.1. have been removed from the operating permit, and the conditions have been marked as “Reserved.” due to the removal of the sections of 45CSR30 that related to emergencies and affirmative defense.
 - d. Due to revisions in 45CSR§30-5.1.c.3.C.2., “telefax” has been updated to “email” in Condition 3.5.8.a.2.
4. Section 5.0. – Door Skin Manufacturing
- a. As emission unit DC2 will be used to produce an adhesive coating in addition to paints, “Painting Manufacturing” has been replaced with “Coating Manufacturing” in Conditions 5.1.11. and 5.2.1. 45CSR7 remains applicable to emission unit DC2, but this minor modification did not result in any changes to the applicable requirements.

Non-Applicability Determinations

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

Not Applicable.

Request for Variances or Alternatives

None.

Insignificant Activities

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

Comment Period

Beginning Date: Not Applicable.
Ending Date: Not Applicable.

Point of Contact

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

Sarah Barron
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41915
sarah.k.barron@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)

None.