



# COMMONWEALTH of VIRGINIA

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**COMMONWEALTH OF VIRGINIA**  
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## STATEMENT OF LEGAL AND FACTUAL BASIS

Huber Engineered Woods, LLC  
1000 Chaney Lane  
Crystal Hill, Virginia  
Permit No. BRRO-30905

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Huber Engineered Woods, LLC has applied for a Title V Operating Permit for its Crystal Hill, Virginia facility. The Department has reviewed the application and has prepared a Title V Operating Permit.

Engineer/Permit Contact: \_\_\_\_\_ Date: \_\_\_\_\_

Mary S. Monroe  
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Air Permit Manager: \_\_\_\_\_ Date: \_\_\_\_\_

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## **FACILITY INFORMATION**

### Permittee

Huber Engineered Woods, LLC  
P.O. Box 38  
Crystal Hill, VA 24539

### Facility

Huber Engineered Woods, LLC: Crystal Hill Plant  
1000 Chaney Lane, Crystal Hill, Virginia 24539

County-Plant Identification Number: 51-083-00050

## **SOURCE DESCRIPTION**

NAICS Code: 321219 – The facility manufactures a reconstituted wood product known as oriented strandboard (OSB).

Logs are delivered to the mill by transport truck from logging operations. The logs are fed onto two conveyor systems that meter the flow of logs through two debarkers which remove the bark from the logs. The bark passes through a conveyor system to a bark hog where it is ground for fuel and stored in a bin until needed as fuel for the Wellons furnace. The debarked logs continue on to waferizers (strandlers) which convert the logs into wood strands. The wood strands (flakes) are dried as they pass through four rotary drum dryers. The dried flakes are screened, classified and conveyed to a blending operation where powdered resin and wax are added. Coated flakes travel to a forming line where they are separated into distribution bins. The forming area is located along a conveyor that runs up to the press area. The flakes are dropped onto the conveyor in layers. The layers of strands are oriented to give the OSB structural properties. After all of the layers are dropped onto the belt, a saw moves along the line and cuts continuous sections of board into approximately 24 foot long segments, referred to as master mats. OSB mats are loaded into the press on a belt conveyor in a batch type operation. The press has fourteen openings or platens, each capable of processing a 24-foot by 8-foot (gross dimensions) OSB panel. The press uses heat and pressure to activate the resins and compresses the flakes into the final product thickness. Press platens are heated by the Wellons wood-fired furnace via a thermal oil loop. The finishing process begins as the master mats exit the press unloader system onto a conveyor leading to hog saws and are stacked in a bin. From the bin, the master mats move to a sanding and sawing process for final dimensional cuts. During this process, the OSB receives a brand and stamp. The edges of the finished panels are sprayed with a sealant. After edge sealing, the OSB is sent to packaging for shipment off-site via truck transport or rail.

The facility is a Title V major source of Particulate Matter (PM10), Nitrogen Dioxides (NOx), Carbon Monoxide (CO), Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP). This source is located in an attainment area for all pollutants, and is a PSD minor source. The facility is currently permitted under a Minor New Source Review (NSR) Permit dated October 16, 2007, last amended November 16, 2015.

The Industrial, Commercial and Institutional Boilers and Process Heaters MACT standard (40 CFR 63 Subpart DDDDD) applies to an existing 40 MMBtu/hr backup process heater (GB). Since the emissions from the backup process heater (GB) are not routed through the direct-fired dryers, the backup process heater (GB) is not subject to the Plywood Composite Wood Products (PCWP) MACT. The preamble of the PCWP rule states in part: the final PCWP rule regulates only that portion of emissions from a combustion unit that are routed through the direct-fired dryers. Any emissions from a combustion unit that are not routinely through the direct-fired dryers would be subject to the Industrial, Commercial, Institutional Boilers and Process Heaters NESHAP.<sup>1</sup> MACT Subpart DDDDD also applies to an existing 1.26 MMBtu/hr boiler (BL). Both units commenced construction before June 4, 2010 and are classified as “gas 1 units” because they only burn natural gas.

The Stationary Reciprocating Internal Combustion Engines MACT standard (40 CFR 63 Subpart ZZZZ) applies to the following existing engines: 208 hp emergency diesel fire pump (commenced construction before June 12, 2006) and 749 hp emergency diesel generator (commenced construction before December 19, 2002).

The PCWP MACT standard (40 CFR 63 Subpart DDDD) applies to the plywood composite wood products manufacturing facility as an existing source (commenced construction before January 9, 2003). The affected source is the collection of dryers, refiners, blenders, formers, presses, board coolers and other process units including the Wellons Energy System, which are associated with the manufacturing of plywood and composite wood products.

The New Source Performance Standard (NSPS) Subpart Dc applies to the 40 MMBtu/hr natural gas-fired backup process heater (GB). The facility also operates a 240 MMBtu/hr wood-fired furnace (Wellons Energy System) which provides a 40 MMBtu/hr heat input to the thermal oil heat exchanger. This heat exchanger is also subject to NSPS Dc. Both units were constructed after the June 9, 1989 applicability date in NSPS Dc.

Compliance Assurance Monitoring (CAM) – The following equipment is subject to CAM: Energy System and Dryers (ES&D), resinated dust handling system (DC2B), press (P), saw dust handling system (FSS), unresinated dust handling system (DC4C), and six head sander (SA2).

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<sup>1</sup> Federal Register, Volume 69, No. 146, July 30, 2004, Page 45963

The application for renewal of this federal operating permit was received on November 13, 2012 and was deemed timely and administratively complete. Supplemental application information was received on May 29, 2015, August 28, 2015, September 23, 2015, March 7, 2016, and April 15, 2016.

**COMPLIANCE STATUS**

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

**EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION**

The emission units, pollution control devices and stacks are the units described in the Significant Emission Units table on pages 2 and 3 of the Title V permit.

**EMISSIONS INVENTORY**

A copy of the 2014 Pollutant Emissions Report is attached. Emissions are summarized in the following tables:

	2014 Criteria Pollutant Emission in Tons/Year				
	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	NO <sub>x</sub>
Total	106.57 tons	105.48 tons	13.04 tons	90.90 tons	115.49 tons

The following hazardous air pollutant emissions were reported from the facility's 2014 TRI Data Summary:

	2014 Hazardous Air Pollutant Emission In Tons/Year				
	Formaldehyde	Methanol	Acetaldehyde	Acrolein	Lead
Total	7.38 tons	14.58 tons	2.17 tons	5.37 tons	0.04 tons

**EMISSION UNIT APPLICABLE REQUIREMENTS**

The following section discusses requirements for emissions units at Huber Engineered Woods, LLC. These requirements are based upon the Minor NSR permit dated October 16, 2007, last amended November 16, 2015 and applicable federal requirements. The conditions from the Title V permit are not repeated verbatim in the following numbered items. The regulatory authority

for each condition is listed in parentheses below each condition in the Title V permit.

### **MACT Subpart DDDDD – Industrial, Commercial, and Institutional Boilers and Process Heaters – Fuel Burning Equipment (GB & BL)**

The 40 MMBtu/hr backup process heater (GB) and 1.26 MMBtu/hr boiler (BL) are subject to 40 CFR Part 63, Subpart DDDDD-National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, Institutional Boilers and Process Heaters. Both units are existing sources located at a major source of hazardous air pollutants.

The backup process heater (GB) is classified as a limited-use process heater under MACT Subpart DDDDD. The Minor NSR Permit dated October 16, 2007, last amended November 16, 2015, placed federally enforceable operating limitations on the heater. The NSR permit limits the backup process heater to 876 hours of annual operation.

#### **General Compliance Requirements**

- Condition 1** The permittee is required to operate in compliance with the requirements of 40 CFR Part 63 Subpart DDDDD, by the applicable compliance dates as specified in 40 CFR 63.7495(b).
- Condition 2** The permittee is required to comply with the applicable General Provisions as specified in 40 CFR 63.7565.

#### **Initial Compliance Requirements**

- Condition 3** The permittee is required to demonstrate initial compliance with the work practice standards as specified in §63.7540(a)(10)(i) through (vi) and Table 3 to Subpart DDDDD no later than the compliance date specified in §63.7495.
- Condition 4** The permittee is required to demonstrate initial compliance with the work practice standards as specified in §63.7540(a)(10)(i) through (vi) no later than the compliance date specified in §63.7495.

#### **Continuous Compliance Requirements**

- Condition 5** The permittee is required to demonstrate continuous compliance with the work practice standards by conducting a 5-year performance tune up according to §63.7540(a)(12).

### **Notifications, Reports and Recordkeeping**

- Condition 6** The permittee is required to submit all of the notifications applicable to the facility in accordance with 40 CFR Part 63 Subpart DDDDD.
- Condition 7** The permittee is required to submit each report in Table 9 of 40 CFR Subpart DDDDD that applies to the permitted facility.
- Condition 8** The permittee is required to keep records of each notification and report that the permittee submitted to comply with 40 CFR 63 Subpart DDDDD.
- Condition 9** The permittee is required to keep records of fuel usage and the federally enforceable permit for the limited use unit (back-up process heater).
- Condition 10** The permittee is required to keep records in a form suitable and readily available for expeditious review, according to §63.10(b)(1).

The recordkeeping and reporting included in this section meet permit content obligations at 9 VAC 5-80-110 E & K and are considered sufficient to assure compliance with the limits included in this permit.

### **Fuel Burning Equipment (EFP & EG1)**

The 208 hp emergency diesel fire pump (EFP) and 749 hp emergency diesel generator (EG1) are subject to the New and Modified Stationary Sources regulations in 9 VAC 5-50-10 et seq. The two engines are not included in the underlying minor NSR permit. The two engines are subject to 40 CFR Part 63, Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines. Both units are existing sources located at a major source of hazardous air pollutants (see the MACT ZZZZ section).

### **Limitations**

- Condition 11** Visible emissions from the emergency diesel fire pump (EFP) and emergency diesel generator (EG1) are limited to 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.
- Condition 12** The approved fuel for the emergency fire pump (EFP) and emergency generator (EG1) engines is diesel fuel.

### **Monitoring**

**Condition 13** The permittee is required to conduct weekly visible emission evaluations of the emergency diesel fire pump (EFP) and emergency diesel generator (EG1) stacks. If visible emissions are observed, the permittee must either correct the issue so that no visible emissions are observed or conduct a VEE in accordance with EPA Method 9. The permittee is also required to maintain an observation log to demonstrate compliance.

### **Recordkeeping**

**Condition 14** The permittee is required to keep records of all emission data and operating parameters necessary to demonstrate compliance with the Title V permit. These records shall include, but are not limited to, visible emission monitoring results and hours of operation.

## **MACT Subpart ZZZZ – Stationary Reciprocating Internal Combustion Engines (EFP & EG1)**

### **General Compliance Requirements**

**Condition 15** The permittee is required to operate in compliance with the emission limitations, operating limitations and other requirements in Subpart ZZZZ that apply to the source at all times.

### **Limitations**

**Condition 16** The permittee is required to comply with the emission limitations and other requirements in Table 2c (1) to Subpart ZZZZ of Part 63.

### **Initial Compliance Requirements**

**Condition 17** The permittee is required to operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission related written instructions or the permittee shall develop their own maintenance plan.

**Condition 18** The permittee may choose to utilize an oil analysis program as described in 40 CFR 63.6625(i) to extend the specified oil change requirement in Table 2(c).

**Condition 19** The permittee is required to minimize the engine's time spent at idle during

startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

### **Monitoring**

**Condition 20** The permittee is required to install a non-resettable hour meter on the stationary RICE if one is not already installed.

### **Continuous Compliance Requirements**

**Condition 21** The permittee is required to demonstrate continuous compliance with each emission limitation, operating limitation and other requirements in Table 2c to Subpart ZZZZ of Part 63 that apply to the source according to the methods specified in Table 6 to Subpart ZZZZ.

**Condition 22** The permittee is required to report each instance in which they did not meet the requirements in Table 8 to Subpart ZZZZ.

**Condition 23** The permittee is required to meet the requirements in 40 CFR 63.6640(f) in order for the engines to be classified as emergency engines. If the permittee does not operate the engines according to these requirements, the engines will not be considered emergency engines under Subpart ZZZZ and shall meet all requirements for non-emergency engines.

### **Notifications, Reports and Recordkeeping**

**Condition 24** The permittee is required to keep records of notifications, reports, each occurrence and duration of each malfunction of operation or the air pollution control equipment, maintenance, actions taken during malfunctions to minimize emissions and to document continuous compliance.

**Condition 25** If the emergency stationary RICE does not meet the standards in Subpart ZZZZ applicable to non-emergency engines, the permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter.

**Condition 26** The permittee is required to keep records in a form suitable and readily available for expeditious review, according to §63.10(b)(1).

**Condition 27** The permittee is required to comply with the applicable requirements in Table 2c

(1) and Table 8 to Subpart ZZZZ.

The monitoring, recordkeeping and reporting included in these two sections pertaining to the emergency diesel fire pump and emergency diesel generator meet permit content obligations at 9 VAC 5-80-110 E & K and are considered sufficient to assure compliance with the limits included in this permit.

### **Process Equipment Requirements – Wood Yard (WY)**

#### **Limitations**

**Condition 28** Particulate emissions from the open storage of wood materials are required to be controlled by wet suppression.

**Condition 29** Visible emissions from the wood yard (WY) operations are limited to 10% opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

#### **Monitoring**

**Condition 30** The permittee is required to conduct daily visible emission evaluations of the wood yard (WY) operation. If visible emissions are observed, the permittee must either correct the issue so that no visible emissions are observed or conduct a VEE in accordance with EPA Method 9. The permittee is also required to maintain an observation log to demonstrate compliance.

#### **Recordkeeping**

**Condition 31** The permittee is required to maintain records of all emission data and operating parameters necessary to demonstrate compliance with the Title V permit. These records shall include, but are not limited to, visible emission monitoring results.

The monitoring and recordkeeping included in this section meet permit content obligations at 9 VAC 5-80-110 E & K and are considered sufficient to assure compliance with the limits included in this permit.

### **Process Equipment Requirements – Energy System & Dryers (ES & D)**

#### **Limitations**

**Condition 32** Four (4) Wet Electrostatic Precipitators (WESPS) followed by (3) Regenerative

Thermal Oxidizers (RTOs) are required to control particulate, VOC and carbon monoxide emissions from the wood-fired energy system and flake dryers (ES & D). The WESPS and RTOs shall be dispatched in accordance with Attachment 1 of the Title V Operating Permit.

- Condition 33** This condition specifies the approved fuels for the wood-fired energy system (ES).
- Condition 34** The wood-fired energy system (ES) shall consume no more than 233,600 tons per year of wood, 40 tons per year of waste wax and resin, 365 tons per year of paper products,  $0.26 \times 10^6$  cubic feet per year of WESP blowdown, and 5,000 gallons per year of hydraulic and hot oil wastes, each calculated monthly as the sum of each consecutive twelve (12) month period.
- Condition 35** The annual throughput of the oven dried flakes through the four dryers combined shall not exceed 578,160 tons per year, calculated monthly as the sum of each consecutive twelve (12) month period.
- Condition 36** Visible emissions from the stacks (RTO 1, RTO 2, RTO 4, and RTO 5,) are limited to 10 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
- Condition 37** This condition specifies the Particulate Matter, PM-10, Sulfur Dioxide, Nitrogen Oxides, Carbon Monoxide and Volatile Organic Compound emission limitations from the operation of the wood-fired energy system, flake dryers, and RTO 1, RTO 2, RTO 4 and RTO 5.
- Condition 38** The permittee is required to develop a maintenance schedule, maintain an inventory of spare parts, to have written operating procedures for the equipment and train operators in the proper operation of all such equipment. The permittee is required to maintain records of maintenance and training on site for a period of 5 years.

### **Monitoring**

- Condition 39** Each WESP shall be equipped with a device for the continuous measurement and recording of secondary current and secondary voltage by field across the ESP.
- Condition 40** Each RTO shall be equipped with a device for the continuous measurement and recording of the temperature in the combustion chamber.

- Condition 41** Continuous emission monitors shall be installed on the RTO 1, RTO 2, RTO 4, and RTO 5 stacks to measure and record opacity. The monitoring systems shall be installed, maintained, evaluated, calibrated and operated in accordance with 40 CFR 60.13, 40 CFR 60 Subpart Dc and 40 CFR 60, Appendix B.
- Condition 42** The permittee is required to install a Parameter Monitoring Systems (PMS), meeting the design specifications of 40 CFR Part 60, Appendix B, to measure and record the emissions of carbon monoxide from the stacks for RTO 1, RTO 2, RTO 4, and RTO 5 in ppmvd corrected to 16% O<sub>2</sub>.
- Condition 43** The permittee is required to implement a PMS quality control program which is equivalent to the requirements of 40 CFR 60.13 and Appendix F for each parameter monitoring system.

#### **Compliance Assurance Monitoring (CAM)**

- Condition 44** The permittee is required to implement an approved Compliance Assurance Monitoring (CAM) Plan to monitor the RTOs controlling CO from the ES&D.
- Condition 45** The permittee is required to implement an approved Compliance Assurance Monitoring (CAM) Plan to monitor the RTOs controlling VOC from the ES&D.
- Condition 46** The permittee is required to implement an approved Compliance Assurance Monitoring (CAM) Plan to monitor the WESPS controlling PM-10 from the ES&D.

#### **Recordkeeping**

- Condition 47** The permittee is required to maintain records of all emissions data and operating parameters necessary to demonstrate compliance with the Title V permit. These records shall include, but are not limited to the following: wood-fired energy system consumption, flake dryer throughput, startup, shutdown, or malfunction events, emission factors used for calculating actual emissions including equations used in the calculations, monitoring records for each WESP and RTO, excess emissions and stack test reports.

#### **Testing**

- Condition 48** The permittee is required to conduct a stack test once every five years to demonstrate compliance with the pound per hour and pound per million BTU

emission limits contained in the Title V permit.

The monitoring and recordkeeping included in Conditions 40 – 43, and 47 meet permit content obligations at 9 VAC 5-80-110 E & K. In addition, the facility will conduct monitoring for VOC, CO and PM-10 from the ES & D as outlined in the Compliance Assurance Plans (Attachments 2, 3, and 4). The required monitoring and recordkeeping are considered sufficient to assure compliance with the limits included in this permit.

### **Process Equipment Requirements – 40 MMBtu/hr Backup Thermal Oil Heater (GB)**

#### **Limitations**

**Condition 49** The approved fuels for the backup thermal oil heater are natural gas and propane.

**Condition 50** The backup thermal oil heater is limited to 876 hours of annual operation.

**Condition 51** Visible emissions from the backup thermal oil heater are limited to 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30% opacity.

#### **Monitoring**

**Condition 52** The permittee is required to conduct weekly visible emission evaluations of the backup thermal oil heater (GB) stack. If visible emissions are observed, the permittee must either correct the issue so that no visible emissions are observed or conduct a VEE in accordance with EPA Method 9. The permittee is also required to maintain an observation log to demonstrate compliance.

#### **Recordkeeping**

**Condition 53** The permittee is required to maintain records of all emission data and operating parameters necessary to demonstrate compliance with the Title V permit. These records shall include, but are not limited to the following: monthly and yearly consumption of natural gas and propane for the backup thermal oil heater, emission factors for all pollutants used to calculate actual emission rates including equations used in the calculations and visible emission monitoring results.

Weekly monitoring of visible emissions from the backup thermal oil heater is included in this section of the permit as the heater is fired on natural gas and no visible emissions from the stack

are expected. The monitoring (weekly visible emissions observations) in conjunction with the recordkeeping specified in Condition 53, meet permit content obligations at 9 VAC 5-80-110 E & K and are considered sufficient to assure compliance with the limits included in this permit.

## **Process Equipment Requirements – Blending and Forming (BF)**

### **Limitations**

- Condition 54** Particulate emissions from the resinated dust handling system are required to be controlled by a fabric filter (DC2B).
- Condition 55** The annual throughput of the oven dried flakes through the three blenders combined shall not exceed 551,976 tons per year, calculated monthly as the sum of each consecutive 12 month period.
- Condition 56** The annual throughput of the powdered resin shall not exceed 10,442 tons per year, calculated monthly as the sum of each consecutive twelve (12) month period.
- Condition 57** Visible emissions from the resinated dust handling system's fabric filter (DC2B) are limited to 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
- Condition 58** This condition specifies the Volatile Organic Compound emission limitation from the operation of the resinated dust handling system (DC2B).
- Condition 59** This condition specifies the Particulate Matter and PM-10 emission limitations from the operation of the resinated dust handling system (DC2B).
- Condition 60** The permittee is required to develop a maintenance schedule, maintain an inventory of spare parts, to have written operating procedures for the equipment and train operators in the proper operation of all such equipment. The permittee is required to maintain records of maintenance and training on site for a period of 5 years.

### **Monitoring**

- Condition 61** The fabric filter (DC2B) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter.

### **Compliance Assurance Monitoring (CAM)**

**Condition 62** The permittee is required to implement an approved Compliance Assurance Monitoring (CAM) Plan to monitor the fabric filter (DC2B) controlling PM-10 from the resinated dust handling system.

### **Recordkeeping**

**Condition 63** The permittee is required to maintain records of all emission data and operating parameters necessary to demonstrate compliance with the Title V permit. The records shall include but are not limited to: blender throughputs in units of oven dried tons per year, powdered resin throughput in units of tons per year, and emission factors for all pollutants used to calculate actual emission rates including equations used in the calculations.

The recordkeeping included in Condition 63 meets permit content obligations at 9 VAC 5-80-110 K. In addition, the facility will conduct daily visible emission observations of the fabric filter exhaust as outlined in the Compliance Assurance Plan (Attachment 6). The required recordkeeping and daily visible emissions monitoring are considered sufficient to assure compliance with the limits included in this permit.

### **Process Equipment Requirements – Press (P)**

#### **Limitations**

- Condition 64** Emissions from the press (P) are to be captured by maintaining a negative pressure within the press enclosure room. Particulate and VOC emissions from the press are required to be controlled by a Regenerative Thermal Oxidizer (RTO #3).
- Condition 65** The annual throughput of the oven dried flakes through the press shall not exceed 551,976 tons per year, calculated monthly as the sum of each consecutive 12 month period.
- Condition 66** Visible emissions from the stack for RTO #3 is limited to 10% opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
- Condition 67** This condition specifies the Particulate Matter, PM-10, Nitrogen Oxides, Carbon Monoxide and Volatile Organic Compound emission limitations from the operation of the press (P).

**Condition 68** The permittee is required to develop a maintenance schedule, maintain an inventory of spare parts, to have written operating procedures for the equipment and train operators in the proper operation of all such equipment. The permittee is required to maintain records of maintenance and training on site for a period of 5 years.

### **Monitoring**

**Condition 69** The RTO #3 shall be equipped with a device for the continuous measurement and recording of the temperature in the combustion chamber.

**Condition 70** The permittee is required to conduct weekly visible emission evaluations of the press stack (S5). If visible emissions are observed, the permittee must either correct the issue so that no visible emissions are observed or conduct a VEE in accordance with EPA Method 9. The permittee is also required to maintain an observation log to demonstrate compliance.

### **Compliance Assurance Monitoring (CAM)**

**Condition 71** The permittee is required to implement an approved Compliance Assurance Monitoring (CAM) Plan to monitor the RTO controlling VOC from the Press.

### **Recordkeeping**

**Condition 72** The permittee is required to maintain records of all emission data and operating parameters necessary to demonstrate compliance with the Title V permit. The records shall include, but are not limited to, yearly throughput of the press in units of oven dried tons per year, monitoring records for the RTO, emission factors for all pollutants used to calculate actual emission rates including equations used in the calculations and visible emission monitoring results.

Weekly monitoring of visible emissions from the press stack is included in this section of the permit as the facility is required to monitor and record the temperature continuously in accordance with MACT DDDD and Condition 69 of the permit. Maintaining the required operating temperature of the RTO (1500 °F) is indicative of adequate combustion and proper operation of the control device. No visible emissions are expected from the press RTO stack. In addition, the facility will conduct monitoring for VOC from the press as outlined in the Compliance Assurance Plan (Attachment 5). This monitoring in conjunction with the recordkeeping specified in Condition 72 and in the MACT DDDD section of the permit, meet

permit content obligations at 9 VAC 5-80-110 E & K and are considered sufficient to assure compliance with the limits included in this permit.

## **Process Equipment Requirements – Finish Sawing (FSS)**

### **Limitations**

- Condition 73** Particulate emissions from the saw dust handling systems (FSS) are required to be controlled by a fabric filter (DC3C).
- Condition 74** Visible emissions from the saw dust handling system's fabric filter (DC3C) are limited to 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
- Condition 75** This condition specifies the Particulate Matter, PM-10 and Volatile Organic Compound emission limitations from the operation of the saw dust handling system (DC3C).
- Condition 76** The permittee is required to develop a maintenance schedule, maintain an inventory of spare parts, to have written operating procedures for the equipment and train operators in the proper operation of all such equipment. The permittee is required to maintain records of maintenance and training on site for a period of 5 years.

### **Monitoring**

- Condition 77** The fabric filter (DC3C) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter.

### **Compliance Assurance Monitoring (CAM)**

- Condition 78** The permittee is required to implement an approved Compliance Assurance Monitoring (CAM) Plan to monitor the fabric filter (DC3C) controlling PM-10 from the saw dust handling system (FSS).

### **Recordkeeping**

- Condition 79** The permittee is required to maintain records of all emission data and operating parameters necessary to demonstrate compliance with the Title V permit. The records shall include but are not limited to, emission factors for all pollutants used

to calculate actual emission rates including equations used in the calculations.

The recordkeeping included in Condition 79 meets permit content obligations at 9 VAC 5-80-110 K. In addition, the facility will conduct daily visible emission evaluations of the fabric filter exhaust as outlined in the Compliance Assurance Plan (Attachment 6). The required recordkeeping and daily visible emissions monitoring are considered sufficient to assure compliance with the permit limits included in this permit.

### **Process Equipment Requirements – Unresinated Dust Handling System (DC4C)**

#### **Limitations**

- Condition 80** Particulate emissions from the unresinated dust handling system (DC4C) are required to be controlled by a fabric filter (DC4C).
- Condition 81** Visible emissions from the unresinated dust handling system's fabric filter (DC4C) are limited to 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
- Condition 82** This condition specifies the Particulate Matter, PM-10 and Volatile Organic Compound emission limitations from the operation of the unresinated dust handling system (DC4C).
- Condition 83** The permittee is required to develop a maintenance schedule, maintain an inventory of spare parts, to have written operating procedures for the equipment and train operators in the proper operation of all such equipment. The permittee is required to maintain records of maintenance and training on site for a period of 5 years.

#### **Monitoring**

- Condition 84** The fabric filter (DC4C) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter.

#### **Compliance Assurance Monitoring (CAM)**

- Condition 85** The permittee is required to implement an approved Compliance Assurance Monitoring (CAM) Plan to monitor the fabric filter (DC4C) controlling PM-10 from the unresinated dust handling system.

### **Recordkeeping**

**Condition 86** The permittee is required to maintain records of all emission data and operating parameters necessary to demonstrate compliance with the Title V permit. The records shall include but are not limited to, emission factors for all pollutants used to calculate actual emission rates including equations used in the calculations.

The recordkeeping included in Condition 86 meets permit content obligations at 9 VAC 5-80-110 K. In addition, the facility will conduct daily visible emission observations of the fabric filter exhaust as outlined in the Compliance Assurance Plan (Attachment 6). The required recordkeeping and daily visible emissions monitoring are considered sufficient to assure compliance with the limits included in this permit.

### **Process Equipment Requirements – Six Head Sander (SA2)**

#### **Limitations**

**Condition 87** Particulate emissions from the six head sander (SA2) shall be controlled by a fabric filter (DC5).

**Condition 88** The permittee is required to control fugitive dust emissions from material handling and load-out from DC5 and from stockpiled material. The permittee is required to use wet suppression or equivalent and/or keep material covered at all times to minimize emissions.

**Condition 89** The throughput of Oriented Strandboard shall not exceed  $522 \times 10^6$  ft<sup>2</sup> per year, calculated monthly as the sum of each consecutive 12 month period.

**Condition 90** This condition specifies the Particulate Matter, PM-10 and Volatile Organic Compound emission limitations from the operation of the six head sander (SA2).

**Condition 91** Visible emissions from the six head sander fabric filter (DC5) are limited to 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

**Condition 92** Visible emissions from the six head sander material handling, load-out, and storage are limited to 10 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

#### **Monitoring**

**Condition 93** The fabric filter (DC5) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter.

**Condition 94** The permittee is required to conduct daily visible emission evaluations from the six head sander material handling, load-out and storage operations. If visible emissions are observed, the permittee must either correct the issue so that no visible emissions are observed or conduct a VEE in accordance with EPA Method 9. The permittee is also required to maintain an observation log to demonstrate compliance.

#### **Compliance Assurance Monitoring (CAM)**

**Condition 95** The permittee is required to implement an approved Compliance Assurance Monitoring (CAM) Plan to monitor the fabric filter (DC5) controlling PM-10 from the six head sander.

#### **Recordkeeping**

**Condition 96** The permittee is required to maintain records of all emission data and operating parameters necessary to demonstrate compliance with the Title V permit. The records shall include but are not limited to the following: OSB throughput in units of square feet through the six head sander (SA2), emission factors for all pollutants used to calculate actual emission rates including equations used in the calculations and visible emission monitoring results.

The monitoring and recordkeeping included in Conditions 94 and 96 meet permit content obligations at 9 VAC 5-80-110 E & K. In addition, the facility will conduct daily visible emission observations as outlined in the Compliance Assurance Plan (Attachment 6). The required recordkeeping and daily visible emissions monitoring are considered sufficient to assure compliance with the limits included in this permit.

#### **Process Equipment Requirements – Brand Name Logo and Nail Mark Application System (IA)**

##### **Limitations**

**Condition 97** The permittee is required to control fugitive VOC emissions from the brand name logo and nail mark application system (IA).

**Condition 98** Visible emissions from the brand name logo and nail mark application system are limited to 5 percent as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).

### **Recordkeeping**

**Condition 99** The permittee is required to maintain records of all emission data and operating parameters necessary to demonstrate compliance with the Title V permit. The records shall include but are not limited the following: monthly and annual material balance of VOC in tons and emission factors for all pollutants used to calculate actual emission rates including equations used in the calculations.

### **Process Equipment Requirements – Liquid Resin Storage Tanks (T2a, T2b, T2c, T2d, T2e, T2f, & T2g)**

#### **Limitations**

**Condition 100** The annual throughput of the phenol formaldehyde liquid resin shall not exceed  $7.52 \times 10^6$  gallons per year, calculated monthly as the sum of each consecutive twelve (12) month period.

**Condition 101** The annual throughput of the MDI liquid resin shall not exceed  $4.96 \times 10^6$  gallons per year, calculated monthly as the sum of each consecutive twelve (12) month period.

#### **Recordkeeping**

**Condition 102** The permittee is required to maintain records of all emission data and operating parameters necessary to demonstrate compliance with the Title V permit. The records shall include but are not limited to the following: yearly throughputs of phenol formaldehyde liquid resin and MDI liquid resin in gallons per year and emission factors for all pollutants used to calculate actual emission rates including equations used in the calculations.

The recordkeeping included in Condition 102 meets permit content obligations at 9 VAC 5-80-110 K and is considered sufficient to assure compliance with the limits included in the permit.

### **MACT DDDD - Plywood and Composite Wood Products (PCWP) MACT Requirements**

The plywood composite wood products manufacturing facility is subject to 40 CFR Part 63 Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products. The affected source is an existing source located at a major source of hazardous air pollutants (HAP).

### **General Compliance Requirements**

**Condition 103** The permittee is required to comply with the applicable provisions of Table 10 of Subpart DDDD.

**Condition 104** Terms in this section of the permit are defined in the Clean Air Act (CAA), in 40 CFR 63.2, the General Provisions, and in 40 CFR 63.2292.

**Condition 105** The permittee is required to comply with the compliance options, operating requirements and work practice standards no later than October 1, 2007.

### **Limitations**

**Condition 106** The permittee is required to use an emission control system to demonstrate that the resulting emissions meet the compliance options and operating requirements in Tables 1B and 2 of Subpart DDDD. This condition outlines the requirements of Table 1B and 2 for the Energy Systems and Dryers (ES&D) and Press (P).

**Condition 107** The permittee is required to meet the work practice requirement in Table 3 of Subpart DDDD. The permittee is required to use non-HAP coating for the group 1 miscellaneous coating operations.

**Condition 108** The permittee is required to be in compliance with the compliance options, operating requirements, and the work practice requirements in Subpart DDDD at all times, except during periods of process unit or control device startup, shutdown, and malfunction; prior to process unit initial startup; and during the routine control device maintenance exemption.

**Condition 109** The permittee is required to operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions of 40 CFR 63.6(e)(1)(i).

**Condition 110** The permittee is required to develop a written startup, shutdown, and malfunction plan (SSMP) according to the provisions of 40 CFR 63.6(e)(3).

### **Initial Compliance Requirements**

**Condition 111** The permittee is required to demonstrate initial compliance with each compliance option, operating requirement, and work practice requirement that applies to the permitted facility according to Tables 5 and 6 of Subpart DDDD and according to 40 CFR 63.2260 through 40 CFR 63.2269.

**Condition 112** The permittee is required to conduct initial compliance demonstrations that do not require performance tests upon initial startup or no later than 30 calendar days after the compliance date (10/1/07).

### **Continuous Compliance Requirements**

**Condition 113** The permittee is required to demonstrate continuous compliance with the compliance options, operating requirements, and work practice requirements in 40 CFR 63.2240 and 63.2241 that apply to the permitted facility according to the methods specified in Tables 7 and 8 of Subpart DDDD.

### **Monitoring**

**Condition 114** The permittee is required to install, operate, and maintain each continuous parameter monitoring system (CPMS) according to paragraphs (a)(1) through (3) of 40 CFR 63.2269.

**Condition 115** For each temperature monitoring device, the permittee must meet the requirements in Condition 114, and paragraphs (b)(1) through (6) of 40 CFR 63.2269.

**Condition 116** The permittee is required to monitor and collect data according to 40 CFR 63.2270.

### **Testing**

**Condition 117** The permittee is required to demonstrate initial compliance with the compliance options and operating requirements by conducting performance tests and establishing each site-specific operating requirement in Table 2 according to the requirements in 40 CFR 63.2262 and Table 4 of Subpart DDDD.

**Condition 118** The permittee is required to conduct performance tests upon initial startup or no later than 180 calendar days after the compliance date that is specified for the permitted facility and according to 40 CFR 63.7(a)(2), whichever is later.

**Condition 119** The permittee is required to conduct each performance test according to the requirements in 40 CFR 63.7(e)(1), the requirements in paragraph (b) through (o) of 40 CFR 63.2262, and according to the methods specified in Table 4 of Subpart DDDD.

### **Recordkeeping**

**Condition 120** The permittee is required to keep records of each notification and report that the permittee submitted to comply with Subpart DDDD, SSMs, performance tests and performance evaluations.

**Condition 121** The permittee is required to keep records in a form suitable and readily available for expeditious review, according to §63.10(b)(1).

### **Reporting, Notifications and Reports**

**Condition 122** The permittee is required to report each instance in which the permitted facility did not meet each compliance option, operating requirement, and work practice requirement in Tables 7 and 8 of 40 CFR 63 Subpart DDDD that applies to the permitted facility.

**Condition 123** The permittee is required to submit all of the notifications in 40 CFR 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) by the dates specified. The permittee is required to notify the Administrator within 30 days before the permittee takes any actions specified in (g)(1) through (3) of 40 CFR 63.2280.

**Condition 124** The permittee is required to submit each report in Table 9 of Subpart DDDD that applies to the permitted facility. This condition outlines reporting requirements for deviations, submission schedules and the information that must be included in the compliance report.

The monitoring, recordkeeping and reporting included in this section meet permit content obligations at 9 VAC 5-80-110 E & K and are considered sufficient to assure compliance with the limits included in this permit.

## **General Compliance Assurance Monitoring (CAM) Provisions**

- Condition 125** Each monitoring approach shall be designed and implemented in compliance with 40 CFR 64.3(b) or (d). This condition outlines the information that is required to be included in the CAM Plan.
- Condition 126** The permittee is required to conduct the monitoring and fulfill the other obligations specified in 40 CFR 64.7 through 40 CFR 64.9.
- Condition 127** If a monitoring approach uses a monitoring device, the permittee is required to maintain the monitoring equipment.
- Condition 128** The permittee is required to conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the PSEU is operating. The requirement to conduct monitoring at all times does not apply to periods of monitoring malfunctions, associated repairs and required quality assurance or control activities.
- Condition 129** Upon detecting an excursion or exceedance, the permittee is required to restore operation of the PSEU (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- Condition 130** Determination that acceptable procedures were used in response to an excursion or exceedance will be based on information available (e.g. monitoring results, review of operation and maintenance procedures and records, and inspection of the control device).
- Condition 131** The permittee is required to notify the BRRO in accordance with the Title V permit and submit a revised CAM Plan for approval if the following conditions should occur: the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions.
- Condition 132** The permittee is required to develop, implement and maintain a QIP in accordance with 40 CFR 64.8 should the number of exceedances or excursions exceeds its threshold in the table included in this condition.

**Condition 133** Monitoring required under Part 64 shall not excuse the permittee from complying with any existing requirements under federal, state, or local law, or any other applicable requirement under the Act, as described in 40 CFR 64.10.

**Condition 134** The permittee is required to maintain records of monitoring data, monitor performance data, corrective actions taken, any written QIP required pursuant to 40 CFR 64.8 and any activities undertaken to implement a QIP.

**Condition 135** The permittee is required to submit CAM reports for each PSEU as part of the Title V semi-annual monitoring reports.

The monitoring, recordkeeping and reporting included in this section meet permit content obligations at 9 VAC 5-80-110 E and are considered sufficient to assure compliance with the limits included in this permit.

## **Facility Wide Conditions**

### **Limitations**

**Condition 136** The annual production of finished Oriented Strandboard shall not exceed 788.5 x 10<sup>6</sup> square feet per year, calculated monthly as the sum of each consecutive 12 month period.

**Condition 137** Visible emissions from other fugitive emission points are limited to ten percent (10%) opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).

### **Recordkeeping**

**Condition 138** The permittee is required to maintain records of all emission data and operating parameters necessary to demonstrate compliance with the Title V permit. These records shall include, but are not limited to, the yearly production of OSB in units of square feet per year, calculated monthly as the sum of each consecutive 12 month period.

### **Testing**

**Condition 139** The permitted facility is required to be constructed in a manner as to allow for emissions testing upon reasonable notice at any time.

**Condition 140** The permittee is required to conduct a stack test at least once every five years from at least one of the fabric filters DC2B (Blending and Forming line), DC3C (Finish Sawing), DC4C (Unresinated Dust Handling System) or SA2 (Six Head Sander) to demonstrate compliance with the applicable hourly VOC emission limit contained in this permit.

### **STREAMLINED REQUIREMENTS**

Condition 36 of the October 16, 2007 (T5-36), last amended November 16, 2015 NSR permit limits visible emissions from the dryer RTO stacks to 10% opacity as determined by EPA Method 9. The NSPS Dc visible emission limit from the dryer RTO stacks is 20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27% opacity. Therefore, the NSPS Dc requirement has been streamlined by the more stringent minor NSR permit requirement.

Condition 31 of the October 16, 2007 (T5-37), last amended November 16, 2015 NSR permit limits filterable particulate matter emissions to 0.04 lbs/MMBtu from the operation of the wood-fired energy system, flake dryers and dryer RTO stacks. The NSPS Dc filterable particulate matter emission limit from this equipment is 0.10 lbs/MMBtu. Therefore, the NSPS Dc requirement has been streamlined by the more stringent minor NSR permit requirement.

The following conditions from the October 16, 2007, last amended November 16, 2015 NSR permit have not been included in the Title V Permit for the reasons stated:

- Conditions 22, 23, 24, 25, 26, 29, 41 and 42 have been completed and are no longer applicable.
- Condition 12 has been streamlined as all of the NSPS Dc applicable requirements are included in the Title V permit.

### **GENERAL CONDITIONS**

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

### **COMMENTS ON GENERAL CONDITIONS**

#### **Conditions 144 – 149 - Permit Expiration**

These conditions refer to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been

delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the “Department of Environmental Quality Agency Policy Statement No. 2-09”.

**Condition 156 - Failure/Malfunction Reporting**

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

**Condition 178 - Asbestos Requirements**

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

**STATE ONLY APPLICABLE REQUIREMENTS**

None

**FUTURE APPLICABLE REQUIREMENTS**

None at this time.

**INAPPLICABLE REQUIREMENTS**

The facility operates a 240 MMBtu/hr Wellons Energy System which includes a 40 MMBtu/hr wood-fired thermal oil process heater. The primary purpose of combustion in this furnace is to provide sufficient heat to dry the wood strands used in the oriented strandboard (OSB) process. The combustion also generates heat for the thermal oil heat transfer system which supplies heat to the press. Since the emissions from this combustion unit are routed through the direct-fired dryers, this combustion unit is subject to the PCWP MACT standard, and therefore, is not subject to the Industrial, Commercial and Institutional Boilers and Process Heaters MACT(40 CFR 63 Subpart DDDDD) standard. MACT Subpart DDDDD states that any boiler or process heater that is part of the affected source subject to another subpart of this part, is not subject to this standard.<sup>2</sup>

The facility operates a Brand Name Logo and Nail Mark Application System (IA). The equipment is used to apply a brand name logo and nail marks on the face of individual sheets of OSB. In addition, the edges of the finished panels are sprayed with an edge sealant. These

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<sup>2</sup> Paraphrased from 40 CFR 63.7491(h)

miscellaneous coating and finishing operations are subject to the PCWP MACT, and therefore, are not subject to the Wood Building Products (Surface Coating) MACT (40 CFR 63 Subpart QQQQ).<sup>3</sup>

The facility also has the capability of producing a sheathing product, composed of OSB with a kraft paper overlay on one side of the board. The kraft paper overlay is applied during the pressing process within the wood products enclosure (WPE). A sheet of impregnated phenol-formaldehyde paper is unrolled under the mat of flakes as it is formed. As the mat is pressed into a board, the overlay paper is pressed to the bottom surface of the board. Since the paper is not applied to the substrate after the pressing, the kraft paper overlay process is subject to the PCWP NESHAP, and therefore, not subject to MACT QQQQ.<sup>4</sup>

The Organic Liquids Distribution (Non-Gasoline) - (OLD) MACT (40 CFR 63 Subpart EEEE) category pertains to the collection of equipment (such as storage tanks) that is used to distribute organic liquids into, out of, or within a facility that is a major source of HAP. Organic liquid means any non-crude liquid or liquid mixture that contains 5% by weight or greater of the organic HAP listed in Table 1 to Subpart EEEE. Included in Table 1 is the compound Methylene diphenyl diisocyanate (MDI) with a CAS No. of 101-68-8. The referenced CAS No. (101-68-8) is for 4,4'-MDI, an isomer of methylene diphenyl diisocyanate. The facility has (4) 10,000 gallon storage tanks that store MDI. The stored MDI is a mixture of Polymeric MDI (CAS No. 9016-87-9) and 4,4'-MDI (CAS No. 101-68-8). However, onsite storage and the preparation of raw materials used in the manufacture of plywood and composite wood products, such as resins, are part of the affected source subject to the PCWP MACT and therefore, not subject to the OLD MACT standard. MACT Subpart EEEE states that storage tanks that are part of an affected source under another 40 CFR Part 63 NESHAP, are excluded from the MACT OLD affected source category.<sup>5</sup>

The facility is permitted to burn “on-site generated wastes” (TV-33) such as “WESP blowdown”. The term “waste” in this condition refers to materials that are secondary materials and is not a declaration of a determination with respect to the definition of solid waste under RCRA. This condition provides for the combustion of these secondary materials only to the extent they are non-hazardous secondary materials that have been determined not to be solid waste. The permittee is required to maintain records in accordance with 40 CFR 60.2740(u) (TV-47.j) to document that the facility is not subject to the requirements of the Commercial and Industrial Solid Waste Incineration (CISWI) rule ( 40 CFR 60 Subpart CCCC or 9 VAC 5-40 Article 45).

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<sup>3</sup> Paraphrased from 40 CFR 63.4681(c)(1)

<sup>4</sup> National Emission Standards for Hazardous Air Pollutants for Wood Building Products (Surface Coating) - Background Information on Final Standards, Summary of Public Comments and Responses EPA-453/R-03-003, January 2003

<sup>5</sup> Paraphrased from 40 CFR 63.2338(c)(1)

Greenhouse Gas Emissions – The facility maintains records of GHG calculations. However, the facility is not currently subject to Mandatory Greenhouse Reporting as outlined in 40 CFR 98.2. There are no applicable GHG permitting requirements.

#### **COMPLIANCE PLAN**

None at this time.

#### **INSIGNIFICANT EMISSION UNITS**

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110. The set of insignificant emission units for the facility has changed from the May 20, 2008 Statement of Basis. The Department has removed certain insignificant activities listed under 9 VAC 5-80-720 (A) at Huber's request. In addition, Huber had requested that certain engines that are no longer in service be removed from the Insignificant Activities list. These engines were permanently shut down on September 16, 2015. Several pressure washer engines and a gasoline air compressor engine have also been removed from the list as Huber has stated that the engines are considered non-road engines.

#### **CONFIDENTIAL INFORMATION**

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

#### **PUBLIC PARTICIPATION**

The draft/proposed permit will be published in *The Gazette-Virginian* on May 20, 2016. The public comment period ran from May 20, 2016 to June 20, 2016. No comments were received. The EPA review period ended on July 5, 2016. One comment was received which has been addressed.

Attachments: 2014 Annual Update – Pollutant Emissions Report  
Mutual Determination Shutdown Letter - copy