

**COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Piedmont Regional Office**

STATEMENT OF LEGAL AND FACTUAL BASIS

Potomac Supply LLC
Location: Westmoreland County, Virginia
Permit No. PRO40371

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, Potomac Supply LLC has applied for a Title V Operating Permit for its Kinsale, Virginia facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date:
Bruce C. Pollock
(804) 527-5143

Air Permit Manager: _____ Date:
James E. Kyle, P.E.

Deputy Regional Director: _____ Date:
Kyle Ivar Winter, P.E.

FACILITY INFORMATION

Permittee

Potomac Supply LLC
1398 Kinsale Rd.
Kinsale, VA 22488

Facility

Potomac Supply LLC
1398 Kinsale Rd.
Kinsale, VA 22488

County-Plant Identification Number: 51-193-0023

FACILITY DESCRIPTION

NAICS 321113 Sawmills; 321114 Wood Preservation; 321918 Other Millwork (including Flooring); 321920 Wood Container and Pallet Manufacturing; and 321999 Miscellaneous Wood Product Manufacturing – Potomac Supply LLC is a lumber production facility, consisting of lumber drying, sawing, planing, pressure-treating, painting and storage. Newer operations include a landscape timber line, wood pellet production, and dry shavings bagging operations. Products produced include raw lumber, kilned lumber, treated lumber, pallets, specialty custom wood fixtures, wood fuel pellets and bagged shavings.

The facility is a Title V major source of volatile organic compounds. This source is located in an attainment area for all pollutants. The facility is currently permitted under a Minor NSR Permit (State Major) issued on February 22, 2011. The initial Title V application was received on January 22, 2010 and deemed administratively complete on January 22, 2010.

The facility filed for Chapter 11 protection on January 1, 2012, but continues to operate.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was conducted on July 29, 2013. 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 emissions units at this facility consist of the following :

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity [§]	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment (dryers and kilns)							
DK-2	VDK-2 (18 vents)	68-ft wood and propane-fired Drying Kiln burner (1997)	15 mmBtu/hr	-	-	-	February 22, 2011
DK-3	VDK-3 (18 vents)	68-ft wood and propane-fired Drying Kiln burner (2006)	25 mmBtu/hr 8600 bd-ft/hr	-	-	-	February 22, 2011
RD-4	SRD-1	Propane-fired, wood biomass dryer (2009)	12 mmBtu/hr 20 wet tons/hr input	Cyclones	C-1	PM-10	February 22, 2011
RD-4A	SRD-1	Wood-fired, wood biomass dryer (2009)	10 dry tons/hr output				
RD-5	SRD-2	Propane-fired wood biomass dryer (2009)	20 mmBtu/hr 32 wet tons/hr input	Cyclones	C-2	PM-10	February 22, 2011
RD-5A	SRD-2	Wood-fired wood biomass dryer (2009)	16 dry tons/hr output				
Internal Combustion Engines							
EG-1	SE-1	Emergency diesel generator (2004)	78 kW (104 hp)	-	-	-	-
EG-2	SE-2	Emergency diesel generator (2004)	45 kW (60 hp)	-	-	-	-
FP-1	SE-3	Diesel fire pump (1974)	240 hp	-	-	-	-
Woodworking Equipment (sawing, planing, chipping)							
W-1	SW-1	Sawing/top chipper – cut to length (pre-1972)	20 tons/hr	Cyclone*	C-4	PM-10	February 22, 2011
W-2	SW-2	Sawing/lower chipper – round to square (pre-1972)	135 tons/hr	Cyclone*	C-5	PM-10	February 22, 2011
W-3	SW-3	Planing (1973)	85 tons/hr 50,000 bd-ft/hr	Cyclone*	C-6	PM-10	February 22, 2011

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity [§]	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
W-5 A&B	SW-6	Dry shavings bagging operations (2010)	12,000 lbs/hr	Baghouse	BH-1	PM-10	February 22, 2011
Pellet Production and Dry Shavings Bagging Operations							
PM-1	SPM-1	Pellet Hammer Mill (2009)	20 dry tons/hr	Closed loop cyclone system**	C-3	PM-10	February 22, 2011
PM-2	SPM-2	Hammer Mill/Tub Grinder (to be built)	20 dry tons/hr		C-7		February 22, 2011
PM-3	SPM-3	Pellet Hammer Mill (to be built)	20 dry tons/hr		C-8		February 22, 2011
Pallet Spray Painting							
SB-1	SSB-1 SSB-2	Spray booth (1992)	3.5 gallons/hr	Panel filters	F-1	PM-10	February 22, 2011

[§] The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

* Potomac Supply considers these cyclones to be an integral part of the material handling system, not pollution control equipment.

**Cyclones for PM-1, PM-2 and PM-3 are enclosed and form a closed loop system which vents back to the pellet mills.

EMISSIONS INVENTORY

A copy of the 2012 annual emission update is available. Emissions are summarized in the following tables.

2012 Actual Emissions

Emission Unit	Facility-wide Criteria Pollutant Emissions in Tons/Year						
	VOC	CO	SO ₂	PM ₁₀	PM _{2.5}	NO _x	Lead
Sawmill	--	--	--	0.6	0.6	--	--
Planing	--	--	--	0.1	0.1	--	--
Wood treatment	--	--	--	0.002	0.002	--	--
Kilns	17.5	11.7	0.6	1.1	1.1	9.6	0.001
Dryers	27.5	19.5	0.0	4.0	4.0	6.7	0.001
Total	45.0	32.2	0.6	5.8	5.8	16.5	0.002

2012 Facility Hazardous Air Pollutant Emissions

Pollutant	Emissions in Tons/Yr
Acrolein	0.5
Formaldehyde	0.2
Hydrochloric Acid	0.4

EMISSION UNIT APPLICABLE REQUIREMENTS – Kilns (DK-2, DK-3)

Fuel Burning Equipment Requirements – the following permit limitations are taken from a minor NSR state major permit dated 02/22/2011.

Limitations

- Condition 13 of the 02/22/2011 NSR permit (Condition III.A.1 of the Title V permit) limits the annual throughput of lumber to the two kilns.
- Condition 20 of the 02/22/2011 NSR permit (Condition III.A.2 of the Title V permit) describes liquefied petroleum gas and wood planer shavings as approved fuels for the kilns.
- Condition 21 of the 02/22/2011 NSR permit (Condition III.A.3 of the Title V permit) limits the annual fuel throughput of the two kilns.
- Condition 26 of the 02/22/2011 NSR permit (Condition III.A.4 of the Title V permit) describes the specifications for the fuels used in the kilns.
- Condition 29 of the 02/22/2011 NSR permit (Condition III.A.5 of the Title V permit) limits the hourly emissions from kiln DK-2.
- Condition 30 of the 02/22/2011 NSR permit (Condition III.A.6 of the Title V permit) limits the hourly emissions from kiln DK-3
- Conditions 31 and 36 of the 02/22/2011 NSR permit (Conditions III.A.7 and 8 of the Title V permit) limits the annual emissions and visible emissions from both kilns combined.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-50-260: Standards for stationary sources

9 VAC 5-50-290: Standards for visible emissions

The following Virginia Administrative Code has been determined not to be applicable since the kilns are not furnaces:

9 VAC 5-40-880: Emission Standards for Fuel Burning Equipment (Rule 4-8)

Monitoring and Recordkeeping:

- Condition III.B.1 of the Title V permit requires monthly visible emissions checks on the two kilns to fulfill the periodic monitoring check for opacity. This is adequate per Rules 5- 4 and 5-1.
- Condition 40 of the 02/22/2011 NSR permit (Condition III.B 2 of the Title V permit) requires records to be maintained for lumber throughput and fuel throughput for the two kilns.

Testing

The Department and EPA has authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Streamlined Conditions

Condition 12 in the February 22, 2011 NSR permit is not included in the Title V permit since kiln DK-1 has been removed from service.

Other

BACT engineering analysis for the 2005 air permits had determined that there were no add-on emission controls available for the dryers. Therefore, these emitters are also not subject to the CAM implementation due to the absence of controls.

EMISSION UNIT APPLICABLE REQUIREMENTS – Dryers (RD-4, RD-5)

Fuel Burning Equipment Requirements – the following permit limitations are taken from a minor NSR state major permit dated 02/22/2011.

Limitations

- Condition 5 of the 02/22/2011 NSR permit (Condition IV.A. 1 of the Title V permit) require PM emissions from the dryers to be controlled by cyclones.
- Condition 10 of the 02/22/2011 NSR permit (Condition IV.A. 2 of the Title V permit) requires proper operation and maintenance of the dryers.
- Condition 14 of the 02/22/2011 NSR permit (Condition IV.A. 3 of the Title V permit) limits the annual processing of wood biomass to the two dryers.
- Condition 22 of the 02/22/2011 NSR permit (Condition IV.A. 4 of the Title V permit) describes propane and wood planer shavings and fines as approved fuels for the dryers.
- Conditions 23-25 of the 02/22/2011 NSR permit (Conditions IV.A. 5-7 of the Title V permit) limits the annual fuel throughput of the two dryers.
- Condition 26 of the 02/22/2011 NSR permit (Condition IV.A. 8 of the Title V permit) describes the specifications for the fuels used in the dryers.
- Condition 27 of the 02/22/2011 NSR permit (Condition IV.A. 9 of the Title V permit) limits the hourly and annual emissions of RD-4.
- Condition 28 of the 02/22/2011 NSR permit (Condition IV.A. 10 of the Title V permit) limits the hourly and annual emissions from RD-5.
- Condition 37 of the 02/22/2011 NSR permit (Condition IV.A. 11 of the Title V permit) limits the visible emissions from the dryers.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-50-260: Standards for stationary sources

9 VAC 5-50-290: Standards for visible emissions

The following Virginia Administrative Code has been determined not to be applicable since the dryers are not furnaces:

9 VAC 5-40-880: Emission Standards for Fuel Burning Equipment (Rule 4-8)

Monitoring and Recordkeeping:

- Condition IV.B. 1 of the Title V permit requires monthly visible emissions checks on the two dryers to fulfill periodic monitoring for opacity.
- Condition 40 of the 02/22/2011 NSR permit (Condition IV.B. 2 of the Title V permit) requires records to be maintained for wood biomass processing, fuel throughput and monitoring records for the cyclones on the dryers.

Testing

The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard. Testing was required for RD-5 while burning wood to demonstrate compliance with the emissions limits. That testing was performed on May 27, 2010

the results indicated the June 17, 2009 permit emission limits needed to be increased for Acrolein and Carbon Monoxide. Therefore, the permit was amended and the allowable emissions were increased in the current permit issued February 22, 2011.

The required initial VEE was performed and passed for the emissions from RD-4 and RD-5 on January 27 and 28, 2010.

Streamlined Conditions

DEQ maintains the right to require testing however, the rotary dryer stack testing is current: the performance tests were accomplished and the required initial visible emissions evaluations were performed and passed. Therefore, initial stack testing and VEE requirements were not in the NSR February 22, 2011 permit and are not in the Title V.

EMISSION UNIT APPLICABLE REQUIREMENTS – Woodworking Equipment (W-1, W-2, W-3, W-5, PM-1, PM-3)

The following permit limitations are taken from a minor NSR state major permit dated 02/22/2011.

Limitations

- Condition 2 of the 02/22/2011 NSR permit (Condition V.A.1. of the Title V permit) requires PM emissions from W-1, W-2 and W-3 to be controlled by cyclones.
- Condition 6 of the 02/22/2011 NSR permit (Condition V.A. 2. of the Title V permit) requires PM emissions from PM-1, PM-2, and PM-3 to be controlled by a closed loop cyclone system.
- Condition 7 of the 02/22/2011 NSR permit (Condition V.A. 3. of the Title V permit) requires PM emissions from W-5 to be controlled by a baghouse.
- Condition 15 of the 02/22/2011 NSR permit (Condition V.A.4. of the Title V permit) limits the annual processing of wood biomass in PM-1 and PM-3.
- Condition 16 of the 02/22/2011 NSR permit (Condition V.A.5. of the Title V permit) limits the annual processing of wood chips by W-1.
- Condition 17 of the 02/22/2011 NSR permit (Condition V.A.6. of the Title V permit) limits the annual processing of wood chips by W-2.
- Condition 18 of the 02/22/2011 NSR permit (Condition V.A.7. of the Title V permit) limits the annual processing of lumber by W-3.
- Condition 32 of the 02/22/2011 NSR permit (Condition V.A.8. of the Title V permit) limits the emissions from W-5.
- Conditions 33 and 37 of the 02/22/2011 NSR permit (Condition V.A.9. and 10 of the Title V permit) limits the annual emissions and visible emissions from W-1, W-2, W-3
- Condition 38 of the 02/22/2011 NSR permit (Condition V.A.11. of the Title V permit) limits visible emissions from W-5.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

- 9 VAC 5-50-260: Standards for stationary sources
- 9 VAC 5-50-290: Standards for visible emissions
- 9 VAC 5-40-2250 Standards for Woodworking Operations

Monitoring and Recordkeeping:

- Condition 8 of the 02/22/2011 NSR permit (Condition V.B.1. of the Title V permit) requires continuous pressure measurement through the baghouse. This is considered adequate to satisfy CAM criteria because an increase in pressure drop would indicate that the bags are not self cleaning adequately; conversely a decrease could mean that a bag or bags have gotten holes or slipped from their fastenings. Both events would then flag the need for non-scheduled maintenance.
- Condition 9 of the 02/22/2011 NSR permit (Condition V.B.3. of the Title V permit) requires an annual internal inspection of the closed loop cyclone system.
- Condition 40 of the 02/22/2011 NSR permit (Conditions V.B.5 and V.B.6. of the Title V permit) requires records of wood chip production of W-1 and W-2, lumber planing through W-2 and monitoring for the baghouse and cyclones.

Testing

The Department and EPA has authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Streamlined Conditions

There were no streamlined Conditions.

EMISSION UNIT APPLICABLE REQUIREMENTS – Spray Booth (SB-1)

The following permit limitations are taken from a minor NSR state major permit dated 02/22/2011.

Limitations

- Condition 3 of the 02/22/2011 NSR permit (Condition VI.A.1. of the Title V permit) requires VOC content of the paint purchased to be limited to 0.9 lb/gal or less.
- Condition 4 of the 02/22/2011 NSR permit (Condition VI.A.2 of the Title V permit) requires PM emissions from SB-1 to be controlled by panel filters.
- Condition 19 of the 02/22/2011 NSR permit (Condition VI.A.3 of the Title V permit) limits the annual throughput of paint in SB-1.
- Condition 34 of the 02/22/2011 NSR permit (Condition VI.A.4 of the Title V permit) limits VOC emissions from SB-1.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-50-260: Standards for stationary sources

Monitoring and Recordkeeping:

- Condition 40 of the 02/22/2011 NSR permit (Condition VI.C.1 of the Title V permit) requires records of paint quantity purchased and MSDS showing VOC content of paint. This presumes to rely on established applicable requirement which is an acceptable approach to control the VOC emissions in the coating operations.

Testing

The Department and EPA has authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Streamlined Conditions

There were no streamlined Conditions.

Other

BACT engineering analysis for the 2009 air permit had determined that: MACT QQQQ did not apply because the painted pallets did not qualify as wood building products.

EMISSION UNIT APPLICABLE REQUIREMENTS – Emergency Diesel Generators and Fire Pump (EG-1, EG-2, FP-1)

Limitations

- The emission units are located at an area source of Hazardous Air Pollutants (HAPs) and must meet the limitation requirements in Table 2d of 40 CFR 63 Subpart ZZZZ.
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first.
 - b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first.
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
 - d. Must install a non-resettable hour meter if one is not already installed on each engine.
 - e. Must minimize the 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, after which time the emission standards applicable to all times other than startup in Table 2d from 40 CFR 63 Subpart ZZZZ .

Monitoring and Recordkeeping:

- Records showing compliance with requirements in Table 2d, 40 CFR 63 Subpart ZZZZ in accordance with 40 CFR 63.6603 ... *operate an existing stationary RICE located at an area source of HAP emissions.*

Testing

The Department and EPA has authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Streamlined Conditions

There were no streamlined Conditions.

Other

The 4-stroke diesels are classified as “existing” emergency equipment. The 240 hp fire pump was purchased in 1974 and the generators 104 hp and 60 hp were purchased in 2004. Their aggregate is less than 500 hp, they are located at an Area HAP facility. Therefore, if the 104hp generator is used in a demand response mode as defined in 40 CFR 63.6604(f)(2)(ii) and (iii) then an annual report is required no later than March 31, 2016.

EMISSION UNIT APPLICABLE REQUIREMENTS – Facility Wide

The following permit limitations are taken from a minor NSR state major permit dated 02/22/2011.

Limitations

- Condition 11 of the 02/22/2011 NSR permit (Condition VIII. A.1. of the Title V permit) requires VOC emissions to be minimized by proper handling and storage of VOC materials.
- Condition 35 of the 02/22/2011 NSR permit (Condition VIII. A.2. of the Title V permit) limits emissions from the entire facility.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-50-260: Standards for stationary sources

Monitoring and Recordkeeping:

- Condition 40 of the 02/22/2011 NSR permit (Condition VIII. B. 1. of the Title V permit) requires records of stack tests, VEEs, maintenance and operator training.

Testing

The Department and EPA has authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Streamlined Conditions

There were no streamlined Conditions.

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

B. Permit Expiration

This Condition refers 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. 2-2003”.

F. 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.

J. Permit Modification

This general Condition cites the sections that follow:

- 9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources
- 9 VAC 5-80-190. Changes to Permits.
- 9 VAC 5-80-260. Enforcement.
- 9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources
- 9 VAC 5-80-1790. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
- 9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general Condition F.

Y. 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.

FUTURE APPLICABLE REQUIREMENTS

None

INAPPLICABLE REQUIREMENTS

Citation	Title of Citation	Description of Applicability
40 CFR 60.40 D	Standards of Performance for Fossil-Fuel-Fired Steam Generators	This Subpart does not apply to the Drying Kilns or Dryers since they are rated at less than 250 MMBtu/Hr
40 CFR 60.40 Da	Standards of Performance for Electric Utility Steam Generating Units	This Subpart does not apply, the drying kilns since these operating units are not used to supply electricity and are rated at less than 250 MMBtu/Hr
40 CFR 60.40 Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	This Subpart does not apply, each of the operating units supplies less than 100 MMBtu/Hr.
40 CFR 60.40 Dc	Standards of Performance for Small Industrial- Commercial-Institutional Steam Generating Units	This Subpart does not apply, the kilns do not transfer heat from combustion gases to a heat transfer medium across a physical barrier as a steam generating unit would.

Citation	Title of Citation	Description of Applicability
40 CFR 60 Kb	Volatile Organic Liquid Storage Vessel Standards	This Subpart does not apply to the distillate oil storage tanks because the fuel has a maximum true vapor pressure of less than 15kPa.
40 CFR 60.4200	Subpart III –Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	This Subpart does not apply. The construction dates for the two emergency generators (both May 2004) and the water fire pump (April 1974) were prior to applicable construction date of July 11, 2005. The order date for the fire pump was before the applicable date, April 2006. The engines were not modified or reconstructed after July 11, 2005.
40 CFR 63.2230 MACT DDDD	National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products.	This Subpart does not apply. The facility is not a plywood and composite wood products manufacturer and is not a major source of HAPs.
40 CFR 63.4680 MACT QQQQ	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products	This Subpart does not apply. The facility is not a major source of HAPs, engages in impregnating wood with treatment applications via pressure vessels, and the pallet painting process does not qualify as wood building product production.
40 CFR 63.7480 MACT DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	This Subpart does not apply. The facility is not a major source of HAPs.
40 CFR 63.11193 MACT JJJJJ	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources	This Subpart does not apply. The kilns and dryers classify as process heaters.
40 CFR 98.1 40 CFR 98.2 40 CFR 98.2 (b)(2)	Subpart A – General Provision (Greenhouse Gas) Who must report?	Reporting not required because: (a) Source category is not listed on Tables A-3 or A-4. (b) Source’s kilns and driers consume biomass fuel. (CO ₂ (e) from that combustion is not included in the total potential), the other non biomass using equipment and use of propane fuel does not have the potential to exceed 25,000 metric tons CO ₂ (e) per year.

Citation	Title of Citation	Description of Applicability
40 CFR 64.2(b)(vi)	Part 64 - Compliance Assurance Monitoring (CAM) – Applicability	This part does not apply. Emission limitations or standards for which a Part 70 or 71 Permit specifies a continuous compliance determination method, as defined in § 64.1. However, at this facility the cyclones are used as inherent process equipment for product transfer and not as Air Pollution Control (APC) devices. Therefore, CAM does not apply.
9 VAC 5-40-880	Emission Standards for Fuel Burning Equipment (Rule 4-8)	15 MM Btu/ hr Kilns exceed the 350,000 Btu/hr threshold for solid fuel burning equipment. However, 9 VAC 5-80-50 takes precedence since the facility is a major source and this regulation has more stringent requirements.

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.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation ¹	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
W-4	Landscape Timber Line (chips & planar shavings with process cyclone)	9 VAC 5-80-720.B.1 Exempt April 1, 2010	PM-10	60,000 lbs/hr
W-6	Specialty Products trailer loadout	9 VAC 5-80-720.B.1	PM-10	N/A ²
W-7	Pallet Mfg. trailer loadout	9 VAC 5-80-720.B.1	PM-10	N/A ²
W-7.a	Pallet Mfg. special shavings trailer loadout	9 VAC 5-80-720.B.1	PM-10	N/A ²
P-1	Pallet spraying process	9 VAC 5-80-720.B.2 Exempt: May 1, 2002	VOC PM10	6 gallons/hr
T-1	Indoor wood treatment process using waterborne, copper-based preservative	9 VAC 5-80-720.B.1 Exempt: March 15, 2002	PM-10	10,000 gallon tank

¹The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

²Application indicates emissions unavailable /insignificant due to collection from cyclones.

CONFIDENTIAL INFORMATION

The source did not submit information and the permit does not contain any confidential information.

PUBLIC PARTICIPATION

The proposed permit was placed on public notice in the Westmoreland News, newspaper from April 30, 2014 to June 2, 2014 .