Statement of Basis
Weyerhaeuser NR Company
Castleberry, Conecuh County, Alabama
Facility/Permit No. 103-0012

This draft Title V Major Source Operating Permit (MSOP) renewal is issued under the provisions of ADEM Admin. Code chap. 335-3-16. The above-named applicant has requested authorization to perform the work or operate the facility shown on the application and drawings, plans and other documents attached hereto or on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of this permit.

This facility was originally constructed in 1998. The initial application for this renewal was received May 13, 2025, and the application was deemed complete on August 14, 2026. The initial MSOP was issued on January 23, 2001, and this is the 5th renewal. The current MSOP was issued on October 1, 2020, became effective on January 23, 2021, and was set to expire on January 22, 2026. Because the application for this renewal was submitted timely, the 4th renewal was administratively extended to the effective date of this permit.

Changes to the facility since the last reissuance of the MSOP include the following:

> **March 31, 2022** – The facility notified the Air Division of the modification of the raw materials used in manufacturing of the I-joists. The changes included supplementing southern yellow pine veneer with Douglas-fir veneer, and changing the resin extender used in the Microllam adhesive. A letter of non-applicability was issued to the facility on April 12, 2022, for the changes.
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> **August 11, 2022** – The facility requested an Administrative Amendment to the Title V MSOP to adjust the semiannual compliance report due dates for Unit 012, Miscellaneous Coating Operations, in accordance with 40 CFR 63 Subpart DDDD, the Plywood and Composite Wood Products MACT. The MSOP was modified on August 17, 2022, to incorporate these changes.
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> **November 16, 2023** – The Air Division received an application from the facility dated April 16, 2018, to perform maintenance modifications on the LVL presses. A letter of non-applicability was issued to the facility on May 23, 2018. However, the maintenance modifications for two of the four presses were delayed due to the Covid-19 Pandemic. In November 2023, the facility requested to continue with the maintenance modifications of the two remaining presses, including the No. 3 Laminating Lumber Machine, which was completed in 2024, and the No. 4 Laminating Lumber Machine, which is scheduled for 2027. The maintenance was completed for the first line as originally scheduled in 2019. After the maintenance of the lines, the capacity of each LVL line would increase from 220 CF/hr to 300 CF/hr for a total capacity of 1200 CF/hr. The emission increases were determined to be below PSD thresholds. A PSD review was not required, and the facility could operate within the existing PSD synthetic minor limits. The Air Division agreed

that the changes could be handled as an off-permit change and issued a letter of non-applicability on December 4, 2023.

December 5, 2024 – The facility requested to perform a trial run of a new resin adhesive in the manufacture of I-joists during the first quarter of 2025. VOC testing provided by the vendor indicated the new product would emit less VOC than the currently used product. The proposed modification was processed as an off-permit change, and a letter of non-applicability was issued on January 8, 2025.

The facility is located in Conecuh County, which is currently listed as attainment/unclassifiable with all National Ambient Air Quality Standards (NAAQS) and is also considered the sausage capital of the world.

There are no current or ongoing enforcement actions against WNR necessitating additional requirements to achieve compliance with the proposed permit conditions. The enforcement and compliance history for the facility can be found at https://echo.epa.gov/ (Search using Facility ID AL0000000103500012).

Permit History

Emission Unit (No.)	Limit	Issuance Date	Basis
Laminating Lumber Machines (003-006)	5.25 lb/hr PM (each)	First appeared in Initial MSOP issued 1/23/01	PSD Avoidance
I-Machine w/Baghouse (007)	1.38 lb/hr PM		
Web Process w/Baghouse (008)	1.47 lb/hr PM		
Press and Wood Hog/Baghouse (009)	1.88 lb/hr PM		
LVL Billet Saw, Trim Saw and Microllam Products line w/Cyclone and Baghouse (010)	2.20 lb/hr PM		
Relay Transfer to Dual Truck Loadout Bin w/ Two Cyclones and a Baghouse (011)	0.18 lb/hr PM		
Laminating Lumber Machines (005-006)	0.375% Resin Methanol Content	Air Permits X009 and X010 issued 6/27/00	CAA Section 112(g) Case-by-Case MACT

Facility Operations

Weyerhaeuser NR (WNR) operates a laminated veneer lumber facility (Weyerhaeuser Evergreen EWP) in Castleberry, Alabama. The significant sources of air pollutants at this facility are a 16 MMBtu/hr gas-fired thermal oil heater, a curing oven, four laminating lumber machines with hot oil presses, an I-Machine, a web process, a wood hog, a relay transfer system to a dual truck loadout, an LVL billet saw, a trim saw, Microllam products line saws, miscellaneous coating

operations which include the application of edge sealers in spray booths, Dyno Overlay application, ink stamping, resin storage tanks, and a 208 Hp diesel-fired emergency water pump.

LVL Billet Production
Veneer is fed into four laminating lumber machines that apply glue adhesives, stack the veneer sheets, and press the sheets together. Heat is supplied to the continuous press by a natural gas-fired thermal oil heater. Depending on the customer needs, a wax impregnated paper (Dyno Overlay) may be pressed into the outer faces of the billets to provide moisture resistance. Fugitive emissions from the press lines are exhausted through building roof vents. There are three roof vents per press line.

After the veneer sheets are pressed together the resulting LVL billet exits the press. As a billet exits each press, it is cut to length by a flying cutoff saw. The trimmed billet material is then processed through a wood hog. Sawdust from the processes is pneumatically conveyed to EU-X007 (No. 1 Cyclone & No. 3 Baghouse) and EU-X011 (No. 4 Cyclone & No. 5 Baghouse).

LVL Products Line
A trim saw, rip saw, and bundle cut saw process the LVL into headers (beams). The company logo and product information is then applied at an ink stamp station. For product lines containing the Dyno Overlay, a water-based edge seal is applied in one of two fully enclosed spray booths. For products without the Dyno Overlay, a water-based seal may be applied to the edges and face of the product (six-sided seal) in a fully enclosed spray booth.

The products line also contains a reject edge back saw and a reject trim saw to recover rejected material. Sawdust generated by these saws is pneumatically conveyed to EU-X011.

Web Stock Preparation
WNR uses specially manufactured oriented strand board (OSB) panels as the "web" of the joists. The panels are manufactured in OSB plants and transported to the facility by truck or rail car.

The web stock panels are cut to size with a web panel saw. The web stock is graded, stacked and transferred to a web serrator. The web serrator cuts the web ends to a special joint. The web stock is then singulated for processing through the web profiler. The web profiler cuts the edges of the web to match the I-flange route. The web stock is restacked and can be transported directly into the I-Machine or to storage. All sawdust from the web preparation equipment is pneumatically transported to EU-X006 (No. 2 Baghouse).

I Machine
The I-Machine takes a pair of LVL beams to a flange feeder. A groove is routed in each flange, a resin adhesive applied, and the web stock is then inserted into the groove to create an I-Joist. The company logo and product markings are applied to the I-joists, which are then cut to length. Sawdust from the routing of flange and cut-off saws are pneumatically conveyed to EU-X005 (No.1 Baghouse). The I-joists are stacked and transported to the Curing Oven.

Curing Oven

Stacks of I-joists are transported through a natural gas-fired curing oven that heats the I-joists up to 220 °F to complete the adhesive cure. The curing oven is vented through the building roof.

Stacker/Nester

The cured I-joists are stacked and nested into a tight bundle. Defective joists are removed for reclaim. The nested bundle is strapped and transferred to a bundle cut saw. Defective joists are cut to length on a separate small reclaim saw. Sawdust from the reclaim saw is pneumatically conveyed to EU-X006.

Wear and Strap Sealer Line

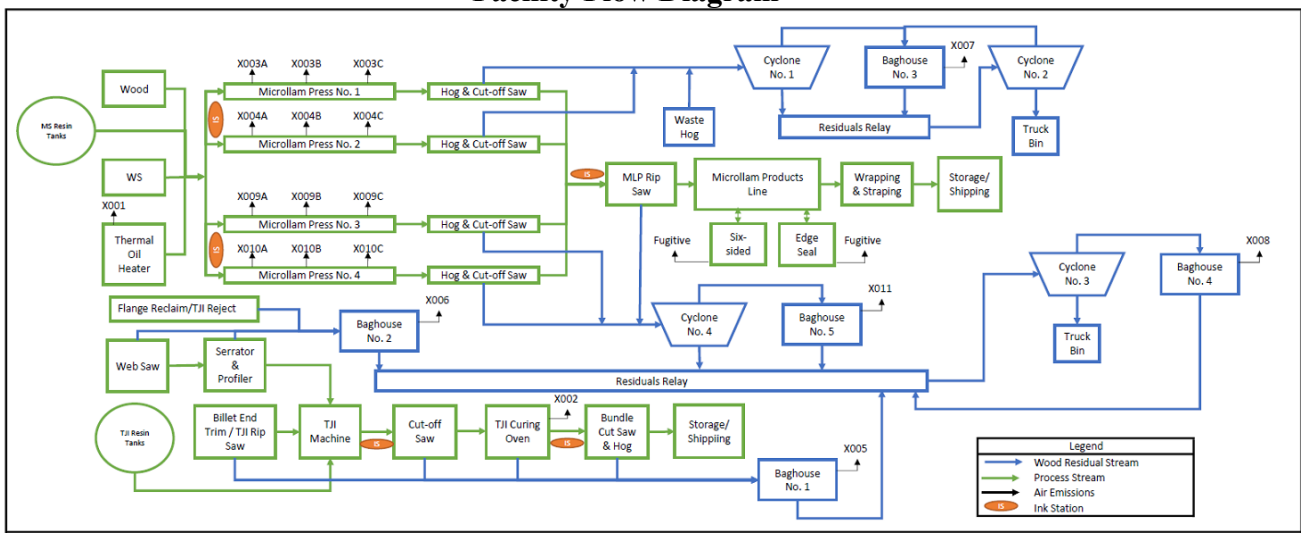
The bundles are cut to final length on the bundle cut saw. Sawdust from the bundle cut saw is pneumatically conveyed to EU-X005. I-joists are trarnsferred to the End Sealer Line where a moisture sealer is applied to the Microllam flanges using a roller. This sealer is a water-based commercial product like the edge sealers commonly used on lumber products. The sealed I-joists are transported to the wrap and strap station. After the bundle is wrapped, it is transported to inventory or shipping.

Sawdust Handling System

The facility maintains four pneumatic transfer systems for the collection of saw dust from the various processes. Sawdust from the I-line process is transferred to EU-X005. Sawdust from the web process is transferred to EU-X006. Sawdust from presses 3 and 4 and the Microlam Reman saw is transferred to EU-X011. Material collected in these systems is relayed to EU-X008.

Material collected in EU-X008 is routed back to the residuals relay system. Sawdust from the Nos. 1 and 2 Press saws and waste hog are transferred to EU-X007. Material collected by EU-X007 is deposited to a relay system which transfers the material to a truck bin through the No. 2 Cyclone. The air discharge from the No. 2 Cyclone is routed to the No. 3 Baghouse.

Facility Flow Diagram



Federal Regulations

Title V

Based on the Title V permit application, this facility is a major source for particulate matter, volatile organic compounds, total HAP, and methanol (a HAP).

PSD

This facility is located in an attainment area for all criteria pollutants, and the facility operations are not one of the listed major source categories. Therefore, the applicable major source emissions threshold would be 250 TPY. The facility is a synthetic minor source for PSD for particulate matter. The following processes have synthetic minor limits which were established when the processes were constructed and/or modified:

- **Nos. 1, 2, 3 and 4 Laminating Lumber Machines with Hot Oil Presses (EU Nos. 003-006)** each have a PM emission limit of 5.25 lb/hr.
- **I-Machine with Baghouse (EU No. 007)** has a PM emission limit of 1.38 lb/hr.
- **Web Process with Baghouse (EU No. 008)** has a PM emission limit of 1.47 lb/hr.
- **Press and Wood Hog with Baghouse (EU No. 009)** has a PM emission limit of 1.88 lb/hr.
- **LVL Billet Saw, Trim Saw, and Microllam Products Line Saws with Cyclone and Baghouse (EU No. 010)** has a PM emission limit of 2.2 lb/hr.
- **Relay Transfer System to a Dual Truck Loadout Bin with Two Cyclones and a Baghouse (EU 011)** has a PM emission limit of 0.18 lb/hr.

National Emission Standards for Hazardous Air Pollutants (NESHAP)(MACT)

Boiler MACT (40 CFR Part 63, Subpart DDDDD)

The gas-fired thermal oil heater is subject to the applicable requirements of 40 CFR 63, Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters* and the applicable requirements of 40 CFR 63, Subpart A, General Provisions as provided in Table 10 to Subpart DDDDD. The facility is required to conduct tune-ups at least annually as specified in 40 CFR §63.7540(a)(10), 40 CFR §63.7515(d) and Table 3 to 40 CFR 63, Subpart DDDDD. The facility submitted an Initial Notification on March 25, 2013.

PCWP MACT (40 CFR Part 63, Subpart DDDD)

All of the significant sources at this facility (except the thermal oil heater) are considered affected sources under the *National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products*, 40 CFR 63, Subpart DDDD [adopted by reference at ADEM Admin. Code r. 335-3-11-.06(81)], the "PCWP MACT".

Miscellaneous Coating Operations

Dyno Overlay

Dyno Overlay is not utilized on all products and is only applied upon customer request. As a beam feeds into a press, a roll of Dyno Overlay (similar to "cling" wrap) unravels, feeding a sheet of overlay onto the top and bottom of the beam. Emissions from Dyno Overlay are vented through the press vents, such that it is actually part of the pressing process. This process is an affected source under Subpart DDDD as it is classified as a miscellaneous coating operation. However, it is not considered a Group 1 miscellaneous coating operation. Therefore, there are no compliance or work practice standards associated with this process.

Edge Sealant and Ink Stamping

During the finishing process, edge sealant is applied to headers in the Microllam Coating Spray Booth. Lumber is also stamped with a non-HAP ink in a separate operation at two stamping stations. These processes are affected sources under Subpart DDDD as they would be classified as Group 1 miscellaneous coating operations. Subpart DDDD requires that Group 1 miscellaneous coating operations utilize non-HAP coatings as defined in § 63.2292 (*a coating with HAP contents below 0.1 percent by mass for Occupational Safety and Health Administration-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and below 1.0 percent by mass for other HAP compounds*) and keep records showing that the facility is using non-HAP coatings. Provisions would be included in the MSOP for the edge sealant application and ink stamping processes that would contain these requirements.

Curing Oven, Pneumatic Transfer System, and Resin Tanks

The curing oven, pneumatic transfer systems, and resin tanks are affected sources under Subpart DDDD; however, these processes are not subject to any compliance or work practice standards.

Laminating Lumber Machines

The laminating lumber machines are affected sources under the PCWP MACT. When Subpart DDDD was initially promulgated there were no compliance or work practice standards for laminating lumber machines. However, EU Nos. 5 and 6 are subject to ADEM Admin. Code r. 335-3-14-.06(3)(c), "Requirements for Control Technology [Determinations for Major Sources in Accordance with Clean Air Act Section 112 (g)]", as there were no applicable source specific MACT for these type units when they were installed. The case-by-case MACT for these processes was determined to be that the methanol content of the formaldehyde resin shall not exceed 0.375%, as certified by the supplier at the time of delivery.

The EPA finalized amendments to the PCWP MACT on July 6, 2026, that include new standards for existing sources (those manufactured before May 18, 2023). Existing sources must comply with applicable new standards by July 6, 2029. WNR concluded the following regarding the new requirements:

- § 63.2292 - Mixed process stream would not apply to the facility as no emission streams subject to table 1B in Subpart DDDD comingle.
- § 63.2241 (g)(1)(i) through (iii) – WNR currently utilizes resins which meet the requirements under § 63.2241 (g)(l).
- § 63.2241(g)(2) - Process wood material purchased for the facility has a specified target moisture below the required 30 percent moisture limit under this section.
- § 63.2280(d)(l) and Table 6 - A Notification of Compliance Status (NOCS) will be submitted for the applicable requirements consistent with the rule. Prior to submittal of the NOCS, WNR will evaluate the resins and process wood materials in use at that time for compliance with the applicable standards as required.

RICE MACT (40 CFR Part 63, Subpart ZZZZ)

This facility has a 208 Hp diesel-fired water pump that is utilized during emergencies. The water pump is subject to 40 CFR 63, Subpart ZZZZ, the *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* (the "RICE MACT"). The engine is classified as an existing source (constructed before June 12, 2006) and is subject to the work practice, recordkeeping and reporting requirements of Subpart ZZZZ, and the applicable requirements of 40 CFR 63, Subpart A, General Provisions as provided in Table 8 to Subpart ZZZZ. The facility must comply with the applicable requirements of 40 CFR §63.6602 and Table 2c to Subpart ZZZZ, which include, but may not be limited to:

(a) Meet the following work practice requirements, except during periods of startup:

  i. Change oil and filter every 500 hours of operation or annually, whichever comes first;

  ii. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and

  iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

(b) During periods of startup, minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

(c) If the unit is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated.

(d) WNR shall not operate this unit except as provided in §63.6640(f)(1) through (f)(4), which include but may not be limited to:

i. Emergency situations;

ii. Maintenance checks and readiness testing, not to exceed 100 hours per year; and

iii. Non-emergency situations, not to exceed 50 hours per year (those 50 hours are counted towards the 100 hours per year provided for maintenance and testing).

(e) In accordance with 40 CFR §63.6625(e) & 40 CFR §63.6640(a), the facility must operate and maintain the unit according to the manufacturer's emission-related written instructions or develop a maintenance plan that provides for, to the extent practicable, the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. The engine must also be equipped with an hour meter in accordance with 40 CFR §63.6625(f).

(f) In accordance with 40 CFR §63.6655, WNR must keep records of the operation and maintenance of the unit. At a minimum, these records shall include:

i. For each period of operation, the length of operation and the reason the engine was in operation during that time. For periods of operation designated as "emergency operation," the records shall reflect what classified the operation as emergency;

ii. The total number of hours the engine was operated during a calendar year subtotaled by the reason the engine was in operation;

iii. The dates of each oil and filter change with the corresponding hour on the hour meter;

iv. The dates of each inspection and replacement of air cleaners, hoses, and belts with the corresponding hour on the hour meter; and

v. The dates and nature of other emission-related repairs and maintenance performed.

(g) The facility must maintain onsite for the life of the unit either a copy of the manufacturer's emission-related operation and maintenance instructions for the unit or the maintenance plan developed in accordance with §63.6625(e).

(h) In accordance with 40 CFR §63.6660, and 40 CFR §63.10(b)(1), the facility must maintain files of all information (including all reports and notifications) required by 40 CFR 63, Subparts A and ZZZZ for the unit, recorded in a form suitable and readily available for expeditious inspection and review. The files must be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data must be retained onsite. The remaining 3 years of data may be retained offsite.

(i) In accordance with 40 CFR §63.6640(b), WNR must report to the Air Division any failure to perform a work practice on the schedule required, including instances when the work practice standard was not performed due to emergency operation or unacceptable risk under a federal, state, or local law. The facility must submit the report within two working days of the deviation and provide an explanation as to why the work practice requirement was not performed.

New Source Performance Standards (NSPS)

The thermal oil heater is subject to NSPS, Subpart Dc, *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units*, as it was installed after 1989. Subpart Dc requires that the facility maintain records of monthly fuel usage in the heater.

The resin tanks are not subject to NSPS Subpart Kb, *Standards of Performance for Volatile Organic Liquid Vessels*, since the maximum vapor pressure of the resin is less than 15 kPa. The water pump engine is not subject to Subpart IIII, *Standards of Performance for Stationary Compression Ignition Combustion Engines*, as it was installed prior to 2006.

State Regulations

Particulate Emission Standard

The oil heater is subject to the particulate emission standard ($E = 1.38H^{-0.44}$) for fuel burning equipment as outlined in ADEM Admin. Code r. 335-3-4-.03(1). The particulate emission standards for the remaining processes are based on the process weights using the appropriate formula $3.59(P)^{0.62}$ or $17.31(P)^{0.16}$ as outlined in ADEM Admin. Code r. 335-3-4-.04(1).

Visible Emission Standard

All processes at this facility are subject to the visible emission standard as outlined in ADEM Admin. Code r. 335-3-4-.01. The VE standard stipulates that the Permittee shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period from any process. Also, at no time shall the Permittee discharge a 6-minute average opacity of particulate emissions greater than 40% from any process.

Control of Organic Emissions

Weyerhaeuser utilizes six vertical, bottom-fill, fixed-roof tanks to store resin utilized in the manufacturing of LVL. The resin tanks are contained within a controlled environment which maintains an ambient temperature of 80 ºF. The application indicates that the true vapor pressure of the resin at 80 ºF is 1.26 psia. Therefore, the tanks would not be subject to ADEM Code r.

335-3-6-.03(1), *Loading and Storage of VOC*, as the regulation applies to VOC with a true vapor pressure greater than or equal to 1.5 psia under storage conditions. Safety Data Sheets (SDS) for the resin would be maintained on site and made readily available for inspection.

Sulfur Compound Emissions Standard
The ADEM Code r. 335-3-5-.01(b) requires that fuel burning installations not emit sulfur dioxide in excess of 4.0 lb/MMBtu heat input. The only process at this facility subject to this standard is the oil heater. However, since the oil heater utilizes natural gas for fuel, the expected SO_2 emissions would be expected to be much less than the applicable standard.

Fugitive Dust and Fugitive Emissions
ADEM Admin. Code r. 335-3-4-.02 requires that precautions be taken to prevent particulate matter from becoming airborne. This rule is applicable to the facility. WNR submitted a fugitive dust plan as part of the application. The dust plan will be included in Appendix A of the permit.

Emission Testing and Monitoring

Thermal Oil Heater and Curing Oven

CAM
The potential emissions of all criteria air pollutants from the thermal oil heater and curing oven are less than the applicable major source threshold. Also, the units have no pollution control devices. Therefore, these units are not subject to the requirements of 40 CFR 64, Compliance Assurance Monitoring (CAM).

Periodic Monitoring and Testing
The thermal oil heater is subject to the SIP particulate limitation for fuel burning equipment and to the SIP SO_2 allowable emission rate of 4.0 lb/MMBtu of heat input. The curing oven is subject to the SIP particulate limitation for Process Industries-General. Natural gas is the only fuel utilized in these processes. Due to the minimal expected PM and SO_2 emissions from the combustion of natural gas, no emission testing or monitoring for PM and SO_2 is considered necessary.

Pneumatic Systems

CAM
The cyclones and baghouses on these units are inherent process equipment used to separate wood residuals from pneumatic system transfer air. CAM does not apply to devices that are considered inherent process equipment.

Periodic Monitoring
Periodic emission monitoring for the pneumatic systems would include the following:

- When operating, each baghouse shall be visually observed a minimum of once a day for visible emissions and a normal differential pressure drop of +0.15 - +5.0 inches of water.

- Properly maintained devices shall be utilized to monitor the pressure differential across the baghouse. The devices shall be replaced annually or calibrated in accordance with manufacturer's recommendations and necessary parts maintained for routine repair.
- Whenever visible emissions are observed or the pressure differential is outside the normal operating range, the facility shall initiate action within three (3) hours to correct the problem and return the system to its normal operating parameters.
- Each cyclone and baghouse shall be inspected for proper operation and cleaned at least annually and whenever visible emissions are observed or the pressure differential across the baghouse is outside the normal operating range.
- Records, including dates and times, of all visible emission observations, pressure drop readings, inspections and cleaning, and corrective actions taken shall be maintained in a logbook and made available for inspection for five (5) years from the date of generation.
- Submittal of semiannual monitoring reports that shall include:

  (1) A statement as to whether all observations for visible emissions were completed as required during the reporting period, and if not, the date(s) and reason(s) why the monitoring was not performed;

  (2) A statement as to whether the annual inspection of the cyclone and baghouse was accomplished during the reporting period, and if so, the date and results of the inspection;

  (3) The date(s), time, nature, and results of any corrective action taken when (1) any visible emissions were observed from the baghouse or (2) a differential pressure across the baghouse was outside of the normal operating range, or (3) an inspection of the cyclone or baghouse indicated that cleaning or emissions-related maintenance was needed.

Testing

Emission testing for PM would be required before the permit expires to determine compliance with the particulate limits for the pneumatic systems. Subsequent emissions tests would have to be conducted at intervals of five years. If a unit is not in operation during the testing window, testing would be required upon startup.

Nos. 1, 2, 3 and 4 Laminating Lumber Machines with Hot Oil Presses

CAM and Periodic Monitoring

Each of these units is subject to a synthetic minor limit of 5.25 lb/hr of particulate matter. CAM would not apply to these units as they do not use control devices to control any emissions. Visible emissions observations from these units would not be feasible since the particulate matter would be mixed with the VOC emissions from the processes. There is no other practical method to monitor the particulate emissions.

Presses 3 and 4 are subject to a case-by-case MACT determination which limits the methanol content of the formaldehyde resin to 0.375%. Compliance with this emission standard would be certified by the supplier at the time of delivery and a copy of the supplier's certification maintained on site and available for inspection.

Testing
No testing for particulate matter would be required as the expected particulate emissions from the laminated lumber machines would be less than the permitted limits. EPA Method 311, *HAPS in Paints & Coatings*, would be utilized to determine the methanol content of the resin should verification ever be required.

Recordkeeping and Reporting

Thermal Oil Heater (001)
WNR would maintain records of the monthly fuel usage for this unit in a permanent form suitable for inspection. The records must be retained for at least five (5) years from the date of generation and made available upon request. The facility would keep a copy of each notification and report submitted to comply with 40 CFR 63, Subpart DDDDD. The records must include all documentation supporting any Initial Notification, Notification of Compliance Status, and any Compliance Report submitted.

WNR would submit semiannual monitoring reports verifying fuel usage records for the unit are being maintained as required and if not, the dates and reasons the records were not maintained. The facility would also submit compliance reports in accordance with 40 CFR 63 Subpart DDDDD that would include the total operating time during the reporting period, the date of the most recent tune-up, the date of the most recent burner inspection, and whether there were any deviations from a work practice standard.

Curing Oven (002)
There would be no recordkeeping or reporting requirements for this unit.

Laminating Lumber Machines 003 and 004
There would be no recordkeeping or reporting requirements for these units.

Laminating Lumber Machines 005 and 006
WNR would maintain a copy of a Certificate of Analysis or an invoice for each shipment of resin delivered by the supplier to include the supplier's certification that the methanol content of the formaldehyde resin does not exceed 0.375% by weight.

Pneumatic Systems
WNR must report and maintain records for the pneumatic systems as previously outlined in the periodic monitoring section for the units noted above.

Coastal Consistency/Class 1

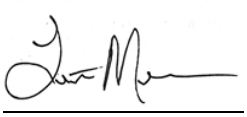
This facility is not located within the 10-foot contour line of Mobile and Baldwin Counties or within 100 kilometers of any Class 1 area.

Public Notice

The renewal of this Title V MSOP would require a 30-day public comment period and a 45-day EPA review period.

Recommendation

I recommend that Weyerhaeuser's Title V MSOP be renewed with the requirements noted above pending the resolution of any comments received during the 30-day public comment period and the EPA 45-day review.



Lester Meredith
Chemical Branch
Air Division

September 15, 2026
Date

VLM/vlm