

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

April 23, 2001

4APT-ARB

Dr. Donald R. van der Vaart, Ph.D., P.E.
Division of Air Quality
North Carolina Department of Environment and Natural Resources
P.O. Box 29580
Raleigh, NC 27626-0580

Dear Dr. van der Vaart:

Thank you for sending the prevention of significant deterioration (PSD) preliminary determination and draft permit dated March 7, 2001, for a change at the Weyerhaeuser Company oriented strand board plant in Elkin, North Carolina. The change consists of a request to increase the permitted production limit from 320 million square feet per year (MMSF/yr) to 350 MMSF/yr.

We have discussed with you whether this change constitutes a "modification" under PSD regulations. Although the increase can be accomplished without any physical changes, our opinion is that the proposed production increase represents a change in the method of operation. This opinion is based on the applicable PSD regulation in this regard - which, for North Carolina, is the regulation in 40 C.F.R. § 51.166(b)(2)(iii)(f). This regulation states that a physical change or change in the method of operation does not include an increase in production rate "unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR subpart I or § 51.166." Since the proposed change would be prohibited without a change in permit conditions, we view the change as a modification. Therefore, we support the procedure of subjecting the proposed production increase to PSD review, including a best available control technology evaluation.

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If you have any questions concerning the comments in this letter, please call Jim Little of the EPA Region 4 staff at (404) 562-9118.

Sincerely,

R. Douglas Neeley
Chief
Air and Radiation Technology Branch
Air, Pesticides, and Toxics
Management Division