

# Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on May 27, 2015.

Permit Number: **R30-05100113-2015**  
Application Received: **July 25, 2017**  
Plant Identification Number: **03-054-05100113**  
Permittee: **CertainTeed Gypsum WV, Inc.**  
Facility Name: **Moundsville**  
Mailing Address: **9622 Energy Road, Proctor, WV 26055**

Permit Action Number: *MM01*      Revised: *December 12, 2017*

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Physical Location:                      Moundsville, Marshall County, West Virginia  
UTM Coordinates:                      516 km Easting • 4,408 km Northing • Zone 17  
Directions:                                The plant is located approximately 5 miles south of Moundsville on State  
Highway 2.

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### Facility Description

This is a gypsum wallboard forming facility. SIC code – 3275. Operations of the gypsum wallboard forming facility consist of receiving raw materials (primarily synthetic gypsum with some natural gypsum and additives), drying, grinding, and calcining the gypsum, followed by mixing with wet and dry additives to form slurry. The slurry is placed between two layers of paper to form the wallboard. The wallboard is dried, cut, and stacked for delivery.

### Proposed Changes

The changes associated with this minor modification consist of removal of EU07, which is a small dust collector on the top of screw conveyor #3.

**Emissions Summary**

For this minor modification, potential emissions will be reduced by 1.72 tpy of PM<sub>2.5</sub> and 3.44 tpy of PM<sub>10</sub>.

**Title V Program Applicability Basis**

With the proposed changes associated with this modification, this facility maintains the potential to emit 342.6 tpy of CO; 121 tpy of NO<sub>x</sub>, and 156.56 tpy of PM<sub>10</sub>. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, CertainTeed Gypsum's Moundsville facility is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

**Legal and Factual Basis for Permit Conditions**

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

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

Federal and State:	45CSR7 45CSR13 45CSR16 WV Code § 22-5-4 (a) (14)  45CSR30 40 C.F.R. Part 60 Subpart OOO	Control of PM from Manufacturing Sources Permits for Construction & Modification New Source Performance Standards The Secretary can request any pertinent information such as annual emission inventory reporting. Operating permit requirement. NSPS for Mineral Processing Plants
State Only:	45CSR4	No objectionable odors.

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

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

**Active Permits/Consent Orders**

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2656F	August 14, 2017	

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

## Determinations and Justifications

- I. **45CSR13, Permit No. R13-2656F.** This Class I Administrative Update was issued for the removal of EU07. The following information was taken from the Engineering Evaluation for R13-2656F.

EU07 is a small dust collector on the top of screw conveyor #3. This screw conveyor transfers dry DSG from the cage mill cyclone and cage mill dust collector to the bucket elevator. The permittee claims this is product recovery (*i.e.*, fabric filter to classify dry DSG). EU07 controls emissions from Screw Conveyor #3 to the bucket elevator. The permittee believes EU07 is not necessary. The permittee proposes to remove EU07 and seal the duct opening of the conveyor with a plate. The permittee believes this change will reduce PM emissions at the facility. If the drop height from screw conveyor to the bucket elevator has been properly minimized and there is a seal between the drop chute and inlet bucket elevator, then fugitive PM emissions will be minimal. The removal of this dust collector does not affect the applicability of the equipment with regard to Subpart OOO. The Dry DSG Conveying Equipment will remain subject to the fugitive opacity standard of Subpart OOO. The permittee identified that the screw conveyor is located within the manufacturing building. Therefore, Subpart OOO restricts visible emissions from any building enclosing any transfer point to zero VEs (Title V condition 4.1.10.(e)). The NSR permit writer agreed with the permittee that the proposed removal of EU07 has no effect on the existing monitoring requirements in Permit R13-2656E. The permit requires monthly VE observations.

### NSR Permit Changes

According to the Engineering Evaluation for R13-2656F, the changes for the transition to permit R13-2656F are limited to omitting emission unit EU07 from:

- Emission Units Table in Section 1.0.;
- The table in condition 4.1.1.; and
- The table in condition 4.1.9.

Because the permittee is sealing the opening of the screw conveyor, the control device for the Dry DSG was changed from fabric filter to full enclosure in Table 1.0.

### Title V Operating Permit Changes

Based upon the changes in the NSR permit described above, the following modifications have been made in the Title V operating permit:

- Section 1.1. Emission Units Table – Deleted the emission unit EU07 and emission point EP07 for the DSG Conveying Equipment, and changed the control device from “Fabric Filter” to “Full Enclosure”.
- Condition 4.1.1. – The row entries for EU07 have been deleted. This includes hourly and annual limits for PM<sub>2.5</sub> and PM<sub>10</sub>.

It should be noted that the totals at the bottom of the table in condition 4.1.1. remained the same for R13-2656F, even though the values for EU07 were deleted. This writer summed the four particulate matter columns to verify the totals, and confirmed the total values in the superseded NSR permit R13-2656E. If the removal of EU07 had been accounted for, the totals would have been as follows:

	PM <sub>2.5</sub>		PM <sub>10</sub>	
	lb/hr	tpy	lb/hr	tpy
<b>Total</b>	<b>52.3</b>	<b>97.4</b>	<b>57.8</b>	<b>121.5</b>

The totals in permit condition 4.1.1. have not been revised in the Title V permit since they would represent more stringent values than those in the underlying permit requirement. If the underlying permit is revised, then the Title V can be revised to reflect the correction.

In addition, during the modification of permit R13-2656E to produce permit R13-2656F, the entire second row for EU36 and its reference to footnote 2 was deleted. This row accounted for operation of Zone 3, and in addition to criteria pollutants and HAPs, the hourly PM limits were specific to processing either Moisture Resistant Board or Regular Board. However, footnote 2 below the table remained in R13-2656F. After being contacted by this writer, the permittee stated that EU36 should not have been modified for permit R13-2656F. For this reason, the contents of the second row for EU36 will remain in Title V permit condition 4.1.1.

- Conditions 4.1.10.(a), (b), and (e) – EU07 has been deleted from the citation of authority. This corresponds to the deletion of EU07 from the table in requirement 4.1.9. of R13-2656F. In addition, the DSG Conveying Equipment has been included in condition 4.1.10.(e) since it is subject to this requirement.
- Section 4.0, and Conditions 4.1.10.(a), (b), and (e), and 4.1.17. – The references to EU05-08 and EU05-EU08 have been changed to clarify that EU07 is not included.
- Condition 4.3.3. – EU07 has been deleted from the citation of authority and the note about testing. The DSG Conveying Equipment has been included in the citation since it is subject to this requirement.
- Conditions 4.5.1., 4.5.2., and 4.5.3. – EU07 has been deleted from the citation of authority. The DSG Conveying Equipment has been included in the citations since it is subject to these requirements.

II. **Facility-wide Reporting Requirements.** The “boilerplate” reporting conditions 3.5.3., 3.5.5., and 3.5.6. have been revised to include information for electronic submittal.

### **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following: None.

### **Request for Variances or Alternatives**

None.

### **Insignificant Activities**

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

### **Comment Period**

Beginning Date: Not applicable for minor modifications  
Ending Date: N/A

### **Point of Contact**

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

Denton B. McDerment, P.E.  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1221 • Fax: 304/926-0478  
[denton.b.mcderment@wv.gov](mailto:denton.b.mcderment@wv.gov)

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Response to Comments (Statement of Basis)**

No comments were received from U.S. EPA.