

# Fact Sheet



## For Proposed 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 March 19, 2019.

Permit Number: **R30-00300012-2019**  
Application Received: **January 28, 2019**  
Plant Identification Number: **03-54-003-00012**  
Permittee: **Knauf Insulation, Inc.**  
Facility Name: **Inwood Plant**  
Mailing Address: **4812 Tabler Station Road, Inwood, West Virginia 25428**

Permit Action Number: *MM01*      Revised: *Proposed*

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Physical Location:                      Inwood, Berkeley County, West Virginia  
UTM Coordinates:                      756.55 km Easting • 4365.50 km Northing • Zone 17  
Directions:                                From Martinsburg, take I-81 southwest to Tabler Station Road, Exit 8 (County Route 32). Site is located on the southeast corner of the I-81 and County Route 32 intersection.

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### Facility Description

Raw Materials are mixed into a batch and the batch is then melted to form glass. The molten glass is separated into streams by use of a forehearth and fiber is spun into strands by the means of fiberizers. The fibers are collected to form a blanket then cured in a three-zone oven. Upon exiting the curing oven the blanket is cooled using a "cooling table". The cooled blanket is then cut to size in rolls and batts of insulation per customer requirements. The facility is characterized by SIC code 3296 (wool fiberglass manufacturing).

### Proposed Modification

The permittee has requested to revise the emission limits in Table 4.1.2.c. of the underlying permit to more accurately allocate emissions from the emission units.

## Emissions Summary

According to the application for this modification, the proposed revisions will not result in an actual or potential increase in emissions from the facility.

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 172.4 tpy of CO; 200.1 tpy of NO<sub>x</sub>; 209.2 tpy of PM<sub>10</sub>; and 112.2 tpy of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Knauf Insulation, Inc. 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.

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

Federal and State:	45CSR13	Construction/modification permits
	45CSR30	Operating permit requirement.

State Only:	None
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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> )
R14-0015N	April 18, 2019	

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.

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## Determinations and Justifications

**45CSR14, Permit No. R14-0015N.** This Class II Administrative Update was permitted to revise the SO<sub>2</sub> and VOC emission limits in its table 4.1.2.c. The following corresponding changes have been made in Title V permit condition 5.1.1.:

- The SO<sub>2</sub> limits in all four rows have been revised; and
- The VOC limit for emission point EP23/EP24 (third row) has been revised.

The language in Title V condition 4.4.2. has been revised to reflect the underlying permit requirement 5.2.4.

The active underlying permit and date of issuance have been revised in operating permit section 1.2.

## 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)

Not applicable for proposed permit modifications.