

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 January 22, 2013.

Permit Number: **R30-08300025-2013**
Application Received: **July 1, 2016**
Plant Identification Number: **03-54-083-00025**
Permittee: **Armstrong Hardwood Flooring Company**
Facility Name: **Beverly Mill**
Mailing Address: **P.O. Box 160, Beverly, WV 26253**

Permit Action Number: *MM04* Revised: *November 29, 2016*

Physical Location:	Beverly, Randolph County, West Virginia
UTM Coordinates:	597.41 km Easting • 4,296.88 km Northing • Zone 17
Directions:	From Charleston take I-79 North to exit 99, proceed east on US Route 33 to Elkins. From Elkins take US Route 250 South. The facility is located approximately 1.6 miles south of Beverly in Randolph County.

Facility Description

The Beverly facility manufactures finished and unfinished hardwood flooring under Standard Industrial Classification (SIC) code 2426. Green lumber is purchased and stacked in the Mill Yard to facilitate air drying of the lumber. The lumber is then further dried in the steam heated pre-dryer and/or one of 38 lumber kilns. Kiln-dried lumber is transferred by one of three lumber tilts to the Mill rough end saws. The rough end saws cut the lumber into strips for transfer to one of six lines of knot saws, side matchers, and end matchers. The unfinished wood flooring is graded, stacked and either stored or transferred to one of two finishing lines. Finished hardwood flooring is graded and packaged for shipment to mill customers.

The facility currently operates two wood fuel-fired boilers (each 48.8 MMBTU/hr) to provide steam for the drying kilns, the stain curing ovens, and the building heating system. A third propane-fired boiler (96.7 MMBTU/hr) is used as backup for periods of shutdown of the wood fired boilers. Each of the wood-fired

boilers (001-01 & 001-02) is equipped with 7,600 square feet of heat surface for generating steam from the combustion of wood waste. Sawdust and wood waste from the mill operations are collected in silos and burned as fuel. These boilers are designed to generate a maximum of 37,110 pounds of steam by burning a maximum of 6,445 pounds per hour of wood waste fuel. An electrostatic precipitator controls particulate matter emissions from the two wood fired boilers.

The purpose of this modification is the installation of a natural gas-fired boiler (Emission Unit ID: 001-04; Emission Point ID: S31) covered under R13-1147T. The natural gas-fired boiler and the two wood-fired boilers can be operated at the same time. This modification also removes the temporary propane-fired boiler (Emission Unit ID: 001-03) from the permit.

Emissions Summary

With this modification, the following pollutants will increase their Potential to Emit (PTE):

Pollutant	PTE Increase (TPY)
PM	1.09
PM ₁₀ /PM _{2.5}	0.88
VOC	0.70
NO _x	5.26
CO	5.36
SO ₂	0.25

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of carbon monoxide (CO), nitrogen oxides (NO_x), and volatile organic compounds (VOCs). Due to this facility's potential to emit over 100 tons per year of criteria pollutants, Armstrong Hardwood Flooring Company 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:	45CSR2	Particulate air pollution from combustion of fuel in indirect heat exchangers
	45CSR2A	Testing, monitoring, recordkeeping and reporting requirements under 45CSR2
	45CSR10	Emission of sulfur oxides.
	45CSR13	NSR permit.
	45CSR16	Standards of performance for new stationary sources
	45CSR30	Operating permit requirement.
	40CFR60, Subpart Dc	Standards of performance for small industrial-commercial-institutional steam generating units

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>)
R13-1147T	September 12, 2016	

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

Equipment Changes

With this modification, the emission units table was updated for the installation of a natural gas-fired boiler (Emission Unit ID: 001-04; Emission Point ID: S31). The natural gas-fired boiler and the two wood-fired boilers can be operated at the same time. This modification also removes the temporary propane-fired boiler (Emission Unit ID: 001-03) from the permit.

Additional Permit Changes

As a result of the equipment changes mentioned previously, the following changes were also made with this modification:

- There were minor revisions to condition 4.1.2 to reflect the current language in R13-1147T, which this condition references.
- The emission limits of condition 4.1.3 were updated. Additionally, the citation to R13-1147T was updated to reflect the appropriate condition.
- Condition 4.1.4 previously limited the propane-fired boiler to 400 hours of operation per year. This condition was revised to cover the new natural gas-fired boiler. This condition contains limits on natural gas consumption and heating values in addition to limiting the boiler to 8,760 hours of operation per year. Additionally, the citation to R13-1147T was updated to reflect the appropriate condition.
- Conditions 4.2.1 and 4.4.3 were revised to mention the natural gas-fired boiler.
- The citation to condition 4.4.3 was revised to include references to 45CSR16 and 40 CFR § 60.48c(g)(2). Note: natural gas-fired boilers are only subject to recordkeeping requirements under 40 CFR 60, Subpart Dc.
- Condition 4.5.3 was added requiring a notification of construction for the natural gas-fired boiler. This condition references 40 CFR § 60.48c(a), 40 CFR § 60.7, and condition 4.5.2 of R13-1147T.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 CFR 63, Subpart JJJJJJ: National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources—this rule does not apply because Armstrong’s boiler (001-04; S31) will burn only natural gas, as specified in 40 CFR § 63.11195(e).

40 CFR 63, Subpart DDDDD: National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters—this regulation does not apply because Armstrong is not a major source.

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: N/A
Ending Date: N/A

Point of Contact

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

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Division of Air Quality
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Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478
Rex.E.Compston@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.