

# 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 February 3, 2014.

Permit Number: **R30-03500049-2014**  
Application Received: **February 5, 2018**  
Plant Identification Number: **03-54-035-00049**  
Permittee: **Armstrong World Industries, Inc.**  
Facility Name: **Armstrong Millwood Plant**  
Mailing Address: **P.O. Box 220, Millwood, WV 25262**

Permit Action Number: *MM02* Revised *August 3, 2018*

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Physical Location: Millwood, Jackson County, West Virginia  
UTM Coordinates: 427.2 km Easting • 4,307 km Northing • Zone 17  
Directions: From US-33 E, turn left onto WV 68 S. Continue on WV 68 S for 0.4 miles. Turn right onto WV 2 S. Continue for approximately 6 miles. Turn right onto Jack Burlingame Road.

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### Facility Description

The Armstrong World Industries Millwood plant is a slag wool manufacturing facility covered under SIC Code 3296. It typically manufactures slag wool from silicomanganese slag. The plant receives the slag via truck or railcar, stores the slag in outdoor piles, and then transfers the slag to a belt conveyor via front-end loader. The slag is then transferred to a submerged Electric Arc Furnace (EAF) where the slag is melted using graphite electrodes. The molten slag is then transferred to one of two spinners which spin the molten slag into slag wool fibers. The wool fibers are then collected in one of two collection chambers, further processed into slag wool bales, and then shipped off site.

This modification incorporates the changes authorized by NSR permit R13-2864C, which allows the installation of a 2,000 lb/hr propane-fueled sand dryer.

### Emissions Summary

The increase of emissions associated with the propane-fueled sand dryer are: CO - 0.16 tpy, NO<sub>x</sub> - 0.28 tpy, PM/PM<sub>10</sub>/PM<sub>2.5</sub> - 0.44 tpy, and VOC - 0.02 tpy.

### Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 242.15 tons per year of carbon monoxide, 103.01 tons per year of PM<sub>10</sub>, and 245.04 tons per year of Sulfur Dioxide. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, Armstrong World Industries, 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:	45CSR7	PM limits on manufacturing processes
	45CSR13	NSR permitting
	45CSR30	Operating permit requirement.

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> )
R13-2864C	March 15, 2018	

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

The following changes have been made to the Title V Permit:

Section 1.0. - The Emission Units Table in Section 1.1. was updated by adding the Propane-fueled Sand Dryer (18S). The Active Permits Table in Section 1.2. was updated by changing R13-2864B, issued on August 21, 2015 to R13-2864C, issued on March 15, 2018.

Section 4.0. - The heading was changed to include 18S. Table 4.1.1.1. was changed to include 18S and its emission limitations from Permit R13-2864C, and the footnote from R13-2864C. Table 4.1.1.2. was revised

to include 18S, however the Propane-fueled Sand Dryer has no emissions of Mn, VOC HAP, or total HAPs. The citations in Conditions 4.1.10. and 4.2.2. were changed to include 18S. Condition 4.2.12. was added to incorporate the recordkeeping requirement from R13-2864C.

45CSR§§7-3.1., 3.2., and 4.1. apply to the Sand Dryer, 18S. Calculating the total stack PM emission rate from Table 45-7A results in an allowable emission rate of 2.4 lb/hr. The PM emission limit from R13-2864C is 0.10 lb/hr, therefore compliance with the R13 permit limit assures compliance with 45CSR§7-4.1. Compliance with visible emission limits of 45CSR§7-3.1. and 3.2. will be demonstrated by conducting monthly visible emission checks in accordance with condition 4.2.2.

### **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: N/A for minor modifications

Ending Date: N/A

### **Point of Contact**

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

Bobbie Scroggie  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57th Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1225 • Fax: 304/926-0478  
Bobbie.Scroggie@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**

None received.