

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 March 19, 2019.

Permit Number: **R30-00300012-2019**

Application Received: **May 25, 2022**

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: *October 3, 2022*

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.

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).

This minor modification is to re-route the air flow from the Main Line 1 (ML1) Cooling Table (Emission Source ES14B) from the ML1 Curing Stack (Emission Point EP14) to a new control device (venturi scrubber CD13B) and then exit to the ML1 Forming Stack (Emission Point EP13).

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_x; 209.2 tpy of PM₁₀; 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	

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

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R14-00150	July 11, 2022	

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

This minor modification includes the following changes in the boiler plate language:

- Per EPA's request, EPA's address was changed in condition 3.5.3 of this permit.
- The citations for conditions 2.11.4 and 2.22.1 were revised.

This minor modification includes the following changes from R14-00150 in this permit:

- The Control Device and Emission Point ID for the Cooling Table for 1st Line (Emission Unit ES14B) were revised.

- Control Device CD13D was added to the Emission Units Table.
- Conditions 3.3.7, 6.2.3, 6.2.4 and 6.4.3 were updated based on the revised R14-0015O conditions.
- Condition 3.3.4 was deleted because this condition was not included in R14-0015O. Additionally, the citation of condition 3.3.5 was revised based on the renumbering of this condition in R14-0015O.
- Minor changes were made to conditions 3.1.17, 3.1.18, 3.3.5, 3.3.6, 3.4.4, 3.4.8, 5.1.3, 5.2.3, 6.1.4, 6.4.3, 7.1.3, 7.1.7, 9.1.6 to match minor changes made to the underlying R14-0015O conditions.

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:

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41283
Beena.j.modi@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.