

Public Meeting

concerning

Roxul USA, Inc.

RAN Facility

September 19, 2023

**West Virginia Division of Air Quality
Public Meeting**

Presentation Outline

- **Introduction**
- **Permitting Process**
- **Project Overview**
- **DAQ Documents**
- **What Happens Next?**
- **Summary and Contact Information**

Permitting Programs

- **“Pre-construction” Permits**
 - **Minor Source Program (45CSR13)**
 - **Major Source in Attainment Areas (45CSR14)**
 - **“Prevention of Significant Deterioration” (PSD)**
 - **Major Source in Non-Attainment Areas (45CSR19)**
- **Post-Construction Operating Permit Program**
 - **Title V Process**
 - **Major Source (Permit) vs. Minor Source (No Permit)**
 - **45CSR30**

Minor Source Permitting Program

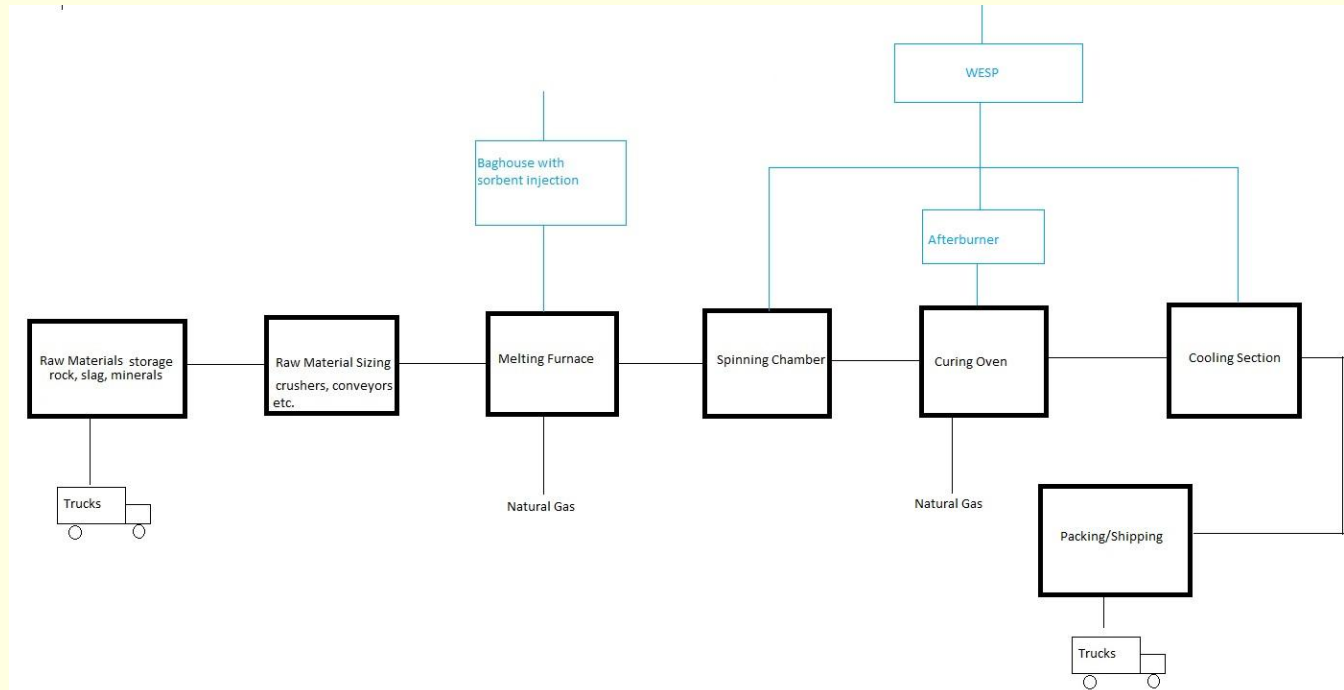
- **Applicable to new and modified “minor sources” of air pollution**
 - Administered under West Virginia Legislative Rule 45CSR13
- **45CSR13 Permitting Process: What it does do:**
 - Determine/enforce compliance with state/federal air quality rules and regulations
 - Determine/enforce compliance with facility’s air emissions
 - Provide framework of public notification/participation
- **45CSR13 Permitting Process: What it does not do:**
 - Take into consideration any other important but non-air quality benefits/impacts such as jobs, property values, traffic, zoning, national energy issues, economics of project, infrastructure, archeology, or public support (or lack thereof) etc.
 - Require or prohibit the location of facilities in any particular area.
 - Address non-air quality environmental impacts (eg water).

Summary of DAQ Review

- **Roxul Application (R14-0037A) Originally Submitted: October 3, 2022**
- **Application originally submitted as a minor modification to a major source**
 - **Application proposed very small emission reductions**
 - **DAQ required proposed emissions to be based on site specific data where possible.**
- **Application resubmitted as a modification to a minor source on May 22, 2023**
- **DAQ Public Advertisement: September 6, 2023**
 - **Preliminary Review Complete: Draft Permit/Fact Sheet Available**
 - **Preliminary Determination**
 - **30-Day Comment Period**
 - **Virtual meeting will be held on September 26, 2023**
- **Comment period ends 5:00 on October 6, 2023**

Roxul Project Overview

- **Jefferson County Facility: Mineral Wool Production Facility**



- **Detailed information in the permit application and engineering evaluation/fact sheet**

Major Changes Addressed in This Application

- Coal as a potential fuel source has been removed.
 - Includes removing all coal handling and preparation operations
- Moving 8 pounds per hour of Carbon Monoxide from furnace to WESP.
 - Based on stack testing that showed lower than expected emissions from the furnace and higher than expected from the curing oven.
- Rockfon line has been removed.
 - Rockfon is Roxuls line of ceiling tiles.

Major Changes Addressed in This Application (cont.)

- Modifications to size of certain combustion sources
 - Boiler sizing (2 boilers) lowered from 5.1 mmbtu/hr to 4.99 mmbtu/hr
 - Afterburner size increased from 6.83 mmbtu/hr to 9.86 mmbtu/hr
 - Emergency fire pump engine size increased from 197 hp to 316 hp
- Removal of Product Marking (PMARK)
 - Inkjet printing replaced with laser marking.

Major Changes Addressed in This Application (cont.)

- Reduction in hours of operation
 - Mineral wool production decreased from 8,760 hours per year to 8,400 hours per year to reflect required 2 week annual downtime for maintenance.
 - Fleece application vent operation decreased from 8,760 hours per year to 4,200 hours per year based on product demand.
- Change in the method of setting emission limits
 - Original permit established limits based (mainly) on emissions from other facilities.
 - New permit sets limits based on actual testing/CEMs data from the Ranson facility.

Changes in Emissions (tpy)

	Emissions under R14-0037	Emissions under R14-0037A	Decrease in Emissions
NO _x	238.95	168.56	-70.39
CO	71.40	60.10	-11.30
VOCs	470.96	196.18	-274.78
SO ₂	147.46	141.34	-6.12
PM	250.90	58.17	-192.73
PM ₁₀	153.21	53.72	-99.49
PM _{2.5}	133.39	49.80	-83.59
HAPs	392.44	261.33	-131.11

Applicable Air Quality Rules

■ WV Legislative Rules

- 45CSR2: Indirect Heat Exchangers (Fuel Burning Units – Particulate Matter)
- 45CSR6: Combustion of Refuse (Flares/Incinerators – Particulate Matter)
- 45CSR7: Manufacturing Process Operations (Particulate Matter/HCl Acid Mist)
- 45CSR10: Sulfur Dioxides Emissions (Boilers and Other Sources of SO₂)
- 45CSR13: Minor Source Permitting Rule
- 45CSR30: Operating Permits (Title V)

■ Federal Air Quality Regulations

- 40 CFR 60, Subpart IIII: Diesel-Fired Engines
- 40 CFR 63, Subpart ZZZZ: Engines (RICE)
- 40 CFR 60, Subpart OOO: Material Handling/Sizing of non-metallic minerals (inc. limestone).
- 40 CFR 63, Subpart DDD: HAP Emission Standards for Mineral Wool Production Facilities.
- 40 CFR 63, Subpart JJJJ: HAP Emission Standards for Paper and Web Coating (applies to fleece binder application).
- 40 CFR 63, Subpart DDDDD: HAP Emission Standards for Boilers.

WVDAQ Documents

- **Engineering Evaluation/Fact Sheet**
 - **Rationale document for Preliminary Determination.**
- **Draft Permit**
 - **Includes operating restrictions, emission limitations and monitoring, recordkeeping and reporting requirements.**
 - **Enforces the potential-to-emit (PTE) upon which we based our Preliminary Determination to approve.**

What Happens Next?

- **Comment period scheduled to conclude at 5:00 pm on Friday, October 6, 2023.**
 - **Virtual public meeting next Tuesday, September 26 to accept comments.**
- **Prior to a final determination, the DAQ will evaluate and respond to timely comments that are relevant to air quality issues.**
- **DAQ will make a Final Determination pursuant to the requirements §45-13-5.7.**
- **Final Determination will be available in same locations as Engineering Evaluation/Fact Sheet and Draft Permit.**

Summary

- **Roxul is proposing to modify a mineral wool production facility in Jefferson County.**
- **DAQ has made a preliminary determination that the proposed modification properly redefines the facility as a minor source and will meet all applicable state rules and federal air quality regulations.**
- **Engineering Evaluation/Fact Sheet and Draft Permit have been available for review since publication of the legal advertisement (September 6, 2023).**
- **DAQ will continue to accept public comments until 5:00 pm on Friday, October 6, 2023.**
- **DAQ will evaluate and respond to all timely public air quality-related comments.**
- **DAQ will make a final determination on this permitting action and make this determination and any related documents available at that time.**

Contact Information

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<https://dep.wv.gov/daq/permitting/Pages/NSR-Permit-Applications.aspx>