

Fact Sheet



For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on October 20, 2020

Permit Number: **R30-05100113-2020**
Application Received: **November 1, 2021**
Plant Identification Number: **03-054-05100113**
Permittee: **CertainTeed Gypsum WV, Inc.**
Facility Name: **Moundsville**
Mailing Address: **9622 Energy Road, Proctor, WV 26055**

Permit Action Number: *SM01* Revised: *February 28, 2023*

Physical Location: Moundsville, Marshall County, West Virginia
UTM Coordinates: 516 km Easting • 4,408 km Northing • Zone 17
Directions: The plant is located approximately 5 miles south of Moundsville on State Highway 2.

Facility Description

This is a gypsum wallboard forming facility. SIC code – 3275. Operations of the gypsum wallboard forming facility consist of receiving raw materials (primarily synthetic gypsum with some natural gypsum and additives), drying, grinding, and calcining the gypsum, followed by mixing with wet and dry additives to form slurry. The slurry is placed between two layers of paper to form the wallboard. The wallboard is dried, cut, and stacked for delivery.

This significant modification is based on permits R13-2656G (issued 06/29/2021), R13-2656H (issued 09/01/2021) and R13-2656I (issued 09/02/2022), and covers the change from an hour per year limitation to a production based limit, a change to the emission limits for the Board Dryer (Emission Unit ID EU36) and the addition of a Formaldehyde emission limit (to account for use of a silicon based additive), a revision of CO emission limits for Kettles K10 and K20 (Emission Unit IDs EU12 and EU13), and a reduction of total annual HAP content of all inks, wet additives and foaming agents.

Emissions Summary

This modification results in the following emission changes:

Pollutant	Change in potential emissions, TPY
PM / PM ₁₀	-1.74
CO	-151.26
NO _x	-0.46
VOC	+1.12

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 191.51 tons per year of CO; 120.54 tons per year of NO_x, and 161.26 tons per year of PM₁₀. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, CertainTeed Gypsum WV, 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 45CSR13 45CSR30 45CSR16 40 C.F.R. Part 60 Subpart UUU	Control of PM from Manufacturing Sources Permits for Construction & Modification Operating permit requirement. New Source Performance Standards NSPS for Calciners and Dryers in Mineral Industries
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>)
R13-2656I	September 2, 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

The following changes are included in the permit:

1. Condition 3.5.3 – permit boilerplate revised to change US EPA address.
2. Condition 4.1.1 – revised emission limits table for several emission units including Board Dryer (Emission Unit ID EU36), Kettles K10 and K20 (Emission Unit IDs EU12 and EU13) and others, and revision of the table footnotes.
3. Condition 4.1.2 – revised fugitive PM emissions from Material Handling (Emission Unit ID EU40).
4. Condition 4.1.14 - the “total annual HAP content of all inks, wet additives and foaming agents” of 22.6 TPY was decreased to 20.0 TPY.
5. Condition 4.1.18 – added Formaldehyde emission limits table for the Board Dryer (Emission Unit ID EU36) to account for use of a silicon based additive.
6. Condition 4.1.19 – revised processing limit of “moisture resistant” board for the Board Dryer (Emission Unit ID EU36) from “hours per year” to “tons per year”.
7. Condition 4.2.9 – deleted monitoring and recordkeeping requirement for amount of recycled material introduced into Kettles (Emission Unit IDs EU12 and EU13).
8. Condition 4.2.10 – revised compliance demonstration requirement with condition 4.1.19.
9. Condition 4.3.1.1 – revised testing requirement to remove phrase “CO testing of the calcining kettle (EU12 or EU13) shall be performed while the recycle rate is at 7.7% or as close as practical”.

Non-Applicability Determinations

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

40 C.F.R. Part 64 Compliance Assurance Monitoring (CAM). The Board Dryer (Emission Unit ID EU36) and Material Handling (Emission Unit ID EU40) emission limits were increased as the result of this modification, but these emission units do not utilize control devices to achieve compliance with any emission limit, therefore CAM is not applicable.

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: January 11, 2023
Ending Date: February 10, 2023

Point of Contact

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

Natalya V. Chertkovsky-Veselova
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41250
natalya.v.chertkovsky@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.