

Fact Sheet



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

Permit Number: **R30-03100030-2022**
Application Received: **October 26, 2021**
Plant Identification Number: **03-054-031-00030**
Permittee: **American Woodmark Corporation**
Facility Name: **South Branch Plant**
Mailing Address: **587 Robert C. Byrd Industrial Park Road, Moorefield, WV 26836**

Physical Location: Moorefield, Hardy County, West Virginia
UTM Coordinates: 677.73 km Easting • 4,327.129 km Northing • Zone 17
Directions: From Town of Moorefield at intersection of Route 28 and Route 55, take Route 55 East (Winchester Ave.) approximately 2.2 miles to Robert C. Byrd Industrial Park Road on left. Plant is approximately 0.5 miles from Route 55 East on Robert C. Byrd Industrial Park Road.

Facility Description

The main process of the facility is the manufacture and finishing of wood doors and frames for shipment to American Woodmark Corporation facilities across the nation for final assembly into finished kitchen and vanity cabinets. Primary processes include dimensioning of kiln-dried wood; assembly of parts to create either doors or frames; and finishing of doors, frames and miscellaneous parts.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2021 Actual Emissions¹
Carbon Monoxide (CO)	51.30	21.03
Nitrogen Oxides (NO _x)	77.50	17.59
Particulate Matter (PM _{2.5})	162.37	18.88
Particulate Matter (PM ₁₀)	162.37	20.54
Total Particulate Matter (TSP)	162.37	20.54 ²
Sulfur Dioxide (SO ₂)	3.19	0.83
Volatile Organic Compounds (VOC)	249.40	127.02
Hazardous Air Pollutants	Potential Emissions	2021 Actual Emissions¹
Formaldehyde	0.62	0.16
Methanol	46.75	15.74
Ethyl Benzene	6.86	1.13
Toluene	15.62	6.20
Xylenes	37.12	6.43
Other HAPs	4.59	3.52
Aggregate HAPs	111.56	33.18

¹ Actual emissions are from the State and Local Emissions Inventory System (SLEIS).

² The company reported 5.68 tpy of TSP in SLEIS for 2021, but there must be an error because TSP includes PM₁₀. Therefore, the writer used changed this value to 20.54 tpy, which was what was reported for PM₁₀.

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit 162.37 tpy of PM₁₀, 249.40 tpy of VOC, 46.75 tpy of methanol, 15.62 tpy of toluene, 37.12 tpy of xylenes, and 111.56 tpy of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, American Woodmark Corporation's South Branch Plant 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Opacity and PM limits for boilers
	45CSR6	Open burning prohibited.
	45CSR7	PM and Opacity limits for manufacturing sources
	45CSR7A	Compliance Test Procedures for 45CSR7
	45CSR10	Sulfur dioxide limits for boilers
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits to construct/modify
	45CSR16	Standards of performance for new stationary sources pursuant to 40 CFR Part 60
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for HAPs
	40 C.F.R. 60 Subparts A and Dc	NSPS for Small Steam Generating Units
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. 63 Subpart JJ	NESHAPs-MACT Standards for Wood Furniture Manufacturing
	40 C.F.R. 63 Subpart ZZZZ	RICE MACT
	40 C.F.R. 63 Subpart DDDDD	Boiler MACT for major sources of HAP
	40 C.F.R. Part 64	Compliance Assurance Monitoring (CAM)
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR27	Emissions of Toxic Air Pollutants

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>)
R13-2571M	June 8, 2015	PD22-106 – NPN issued 8/24/22

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

1. **Title V Boiler Plate Changes.** The reference notation for Section 2.11.4. was changed from 45CSR§30-2.39 to 45CSR§30-2.40 because this definition was renumbered in 45CSR30.

The reference notation for Section 2.22.1. was changed to delete 45CSR38 because it has been repealed.

2. **45CSR30 – Title V Operating Permit Reporting and Monitoring Requirements.** The content of permit condition 3.5.3. has been modified to include the new point of contact and Section title for US EPA.
3. **Formatting Changes.** The indentation and spacing for the following sections were updated to match those found throughout the rest of the permit: 3.1.18, 3.1.19, 3.2.3, 3.4.5, 3.4.6, 3.4.8, 3.4.10, 5.3.17, 5.3.23, 5.3.25, 5.3.28, 5.4.5, 5.4.6, 5.4.18 and 5.5.2.
4. In Section 3.7.2, former item d was deleted because 45CSR29 has been repealed. As a result, the following items were also renumbered.
5. In Section 5.3.14 in Table 7 in the second row in the fourth column, the reference to condition 5.2.17 was changed to 5.2.16 to correct a typographical error.
6. In Section 11.1.6.(2), subsections 11.1.6.(2)(ii) and 11.1.6.(2)(iii) and their references were deleted as a result of these sections being vacated from the rule.

Non-Applicability Determinations

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

- a. **40 C.F.R. 60 Subparts K, Ka, Kb - Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after June 11, 1973 and prior to May 19, 1978; after May 18, 1978, and prior to July 23, 1984; after July 23, 1984, respectively.** The permittee utilizes thirty-five (35) tanks at the facility. Regardless of the construction date, these New Source Performance Standards (NSPS) are applicable to tanks with capacities of at least 20,000 US gallon or 40,000 US gallon. The permittee's tanks T1 through T35 do not satisfy this requirement since the largest capacity tanks at the facility are 5,500 US gallon each. Therefore, tanks T1 through T35 are not subject to 40CFR60 Subparts K, Ka, Kb.
- b. **40 C.F.R. 60 Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.** The permittee currently operates two (2) boilers at the facility. The wood-fired Boiler B1 has a design capacity of 28.8 MMBtu/hr. The natural gas-fired boiler B2 has a design capacity of 20.9 MMBtu/hr. The boilers listed above were constructed after June 19, 1984, which satisfies part of the applicability criteria. However, the boilers listed above have a design heat input capacity less than 100 MMBtu/hr. The rule requires that both the construction date and the design heat input capacity criteria be met in order to be applicable to a source. Therefore, the boilers listed are not subject to 40 C.F.R. 60 Subpart Db.
- c. **45CSR21 - Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds.** 45CSR21 applies to sources located in Putnam, Kanawha, Cabell, Wayne, and Wood Counties. American Woodmark's South Branch facility is located in Hardy County; therefore, it is not subject to 45CSR21.

- d. **45CSR13, R13-2571M, 4.1.43.** This construction permit condition is only applicable when the emissions from at least two emission units vent through the same stack (i.e., emission point). None of the boilers are installed and operated in this fashion. Therefore, this particular construction permit condition will not be included in the Title V permit.
- e. **45CSR13, R13-2571M, 4.1.45.** The construction permit condition 45CSR13, R13-2571M, 4.1.45. is based upon 45CSR§10-8.2.a. In the Exemptions and Recommendations set forth in 45CSR§10-10.3., all fuel burning units which combusts natural gas, wood or distillate oil, alone or in combination, shall be exempt from the testing, monitoring, recordkeeping, and reporting requirements set forth in 45CSR§10-8. Since boiler B1 combusts wood and B2 combusts natural gas, they are exempt from 45CSR§10-8 and the construction permit condition 45CSR13, R13-2571M, 4.1.45., is not applicable and will not be included in the Title V permit.
- f. **45CSR13, R13-2571M, 4.1.46.** This construction permit condition states, "At the time a stationary source is alleged to be in compliance with an applicable emission standard and at reasonable times to be determined by the Secretary thereafter, appropriate tests consisting of visual determinations or conventional in-stack measurements or such other tests the Secretary may specify shall be conducted to determine compliance." This construction permit condition is not an applicable requirement for Title V permitting. Therefore, this condition will not be included in the permittee's Title V permit. Any testing required will be permitted in accordance with Section 3.3. of the permit, and other specific test requirements that may be set forth in each section of the permit.
- g. **45CSR13, R13-2571M, 4.1.49.** This requirement to develop an SSM plan is based upon a vacated version of NESHAPs-MACT Subpart DDDDD. Furthermore, §63.7505(e) in the current regulation applies only when using the paragraph (2) definition of "startup" in §63.7575. Since the permittee is using the paragraph (1) definition, this requirement is not applicable. For these reasons, the underlying permit requirement is not applicable and has been excluded from the renewal permit.
- h. **45CSR13, R13-2571M, 4.1.51.** This maintenance requirement is based upon a vacated version of §63.7505(b). Furthermore, §63.7505(b) is reserved in the current regulation; therefore, this underlying permit requirement is not applicable.
- i. **45CSR13, R13-2571M, 4.1.52. and 4.1.53.** These requirements for seven selected metals and manganese are based upon a vacated version of NESHAPs-MACT Subpart DDDDD. Furthermore, §63.7507(b) does not exist in the current regulation; therefore, this underlying permit requirement is not applicable.
- j. **45CSR13, R13-2571M, 4.1.54. and 4.1.55.** The emission limitations for HCl and Hg are based upon a vacated version of NESHAPs-MACT Subpart DDDDD. Furthermore, the HCl and Hg limits in the underlying permit requirements are not those in the current regulation; therefore, this underlying permit requirement is not applicable.
- k. **45CSR13, R13-2571M, 4.1.56.** This requirement pertaining to SSM operation is based upon a vacated version of §63.7540(c). Furthermore, §63.7540(c) in the current regulation pertains to demonstrating compliance with the mercury standard for units designed to burn gas 1 subcategory; therefore, this underlying permit requirement is not applicable.
- l. **45CSR13, R13-2571M, 4.3.2.** This fuel analysis requirement is based upon a vacated version of §63.7515(f). Furthermore, §63.7515(f) in the current regulation pertains to reporting results of performance tests within 60 days of their completion; therefore, this underlying permit requirement is not applicable.

- m. **45CSR13, R13-2571M, 4.5.4.** This reporting requirement is based upon a vacated version of §63.7515(g). Furthermore, §63.7515(g) in the current regulation pertains to performance testing within 180 days of re-starting a source that has not been operating; therefore, this underlying permit requirement is not applicable.
- n. **40 C.F.R. 60 Subpart III – *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.*** This subpart applies to manufacturers, owners, and operators of stationary compression ignition internal combustion engines that have been constructed, reconstructed, or modified after various dates, the earliest of which is July 11, 2005. The fire water pump engine (FP1) is a compression ignition engine; however, it was constructed in 2004. Since FP1 does not meet the applicability criteria, the requirements of this subpart do not apply.
- o. **40 C.F.R. 60 Subpart JJJJ – *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.*** This subpart applies to manufacturers, owners, and operators of stationary spark ignition internal combustion engines that have been constructed, reconstructed, or modified after various dates, the earliest of which is June 12, 2006. The fire water pump engine (FP1) is a compression ignition engine; therefore, FP1 does not meet the applicability criteria and the requirements of this subpart do not apply.

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: September 7, 2022
Ending Date: October 7, 2022

Point of Contact

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

Daniel P. Roberts
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41902
Daniel.p.roberts@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.