

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 original Fact Sheet corresponding with the issuance of the initial Title V operating permit issued on June 28, 2007.

Permit Number: **R30-08300025-2007**
Application Received: **December 10, 2009**
Plant Identification Number: **03-54-08300025**
Permittee: **Armstrong Hardwood Flooring Company**
Facility Name: **Beverly Mill**
Mailing Address: **160 Route 250 South, Beverly, WV 26253**

Permit Action Number: *MM02* Revised: *April 13, 2010*

Physical Location: Beverly, Randolph County, West Virginia
UTM Coordinates: 597.41 km Easting • 4,296.88 km Northing • Zone 17
Directions: From Charleston take Interstate 79 North to exit 99, proceed east on US
Route 33 to Elkins. From Elkins take US Route 250 South, the facility is
located on the right of and adjacent to US Route 250 approximately 1.6
miles south of Beverly in Randolph County.

Facility Description

The Beverly facility manufactures finished and unfinished hardwood flooring under Standard Industrial Classification (SIC) code 2426. Green lumber is purchased by the facility and is stacked in the Mill Yard to facilitate air drying of the lumber. The lumber is then further dried in the steam heated pre-dryer and/or one of 38 lumber kilns. Kiln-dried lumber is transferred by one of three lumber tilts to the Mill rough end saws. The rough end saws cut the lumber into strips for transfer to one of six lines of knot saws, side matchers, and end matchers. The unfinished wood flooring is graded, stacked and either stored or transferred to one of two finishing lines. Finished hardwood flooring is graded and packaged for shipment to mill customers.

This modification is due to issuance of R13-1147I which incorporates adding equipment for soft scrape flooring production. The typical production rate is 5,000 square feet per shift/run. There is existing denib equipment already in place at the plant. The proposed soft cell would only operate when one of the existing denibbers (Emission Unit ID 002-01D.1) is not operating on the existing plant finish line #1. Therefore, dust loading to existing Baghouse #1 is not increasing.

Armstrong is also requesting as an alternative operating scenario, to have the ability to idle the proposed soft scrape cell, and replace one of the existing denib brush rolls with an oscillating soft scrape roll. Armstrong states that dust loading to Baghouse #1 would not increase under this scenario, while the cell is idle, because a denib brush roll would be replaced with an oscillating soft scrape roll, which would generate similar amounts of particulate.

Installation of the equipment would allow the plant to have additional flexibility to produce various products.

Emissions Summary

There will be no change in emissions from the proposed changes; therefore, there will be no changes to the current permit limits.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of carbon monoxide (CO), nitrogen oxides (NO_x), and volatile organic compounds (VOCs). Due to this facility's potential to emit over 100 tons per year of one or more criteria pollutants, Armstrong Hardwood Flooring Company 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	
	45CSR30	Operating permit requirement.
State Only:	N/A	

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft 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 (if any)
R13-1147I	February 9, 2010	N/A

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 B" which may be downloaded from DAQ's website.

Determinations and Justifications

1. This modification incorporates adding equipment for soft scrape flooring production. Emission Unit 002-04A has been added to Section 1.0. The typical production rate is 5,000 square feet per shift/run. Section 6.1.5 has been added to the permit specifying maximum processing rates and compliance shall be determined using a twelve month rolling total. Section 6.4.3 has been added to maintain records of the amount of material processed on Finish Line #1 (Source ID# 002-01) and Finish Line #2 (Source ID# 002-02) respectively to show compliance. There is existing denib equipment already in place at the plant. Section 6.1.6 has been added with the following restriction - The proposed soft cell would only operate when one of the existing denibbers (Emission Unit ID 002-01D.1) is not operating on the existing plant finish line #1. Therefore, dust loading to existing Baghouse #1 is not increasing.

2. Armstrong is also requesting as an alternative operating scenario, to have the ability to idle the proposed soft scrape cell, and replace one of the existing denib brush rolls with an oscillating soft scrape roll. Armstrong states that dust loading to Baghouse #1 would not increase under this scenario, while the cell is idle, because a denib brush roll would be replaced with an oscillating soft scrape roll, which would generate similar amounts of particulate. **This request does not require any change in the permit.**

Installation of the equipment above would allow the plant to have additional flexibility to produce various products.

3. Sections 3.5.3 and 3.5.5 have been revised to incorporate electronic submittal of annual certification to EPA.

4. Section 3.1.4 citation has been changed from 45CSR15 to 45CSR34 because 45CSR15 has been repealed and 45CSR34 includes 45CSR15 requirements.

Changes proposed above do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit.

Non-Applicability Determinations

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

N/A

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

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

U.K.Bachhawat
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

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.

Point of Contact

U.K.Bachhawat
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1256 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

During the proposed period Armstrong Hardwood Flooring (Armstrong) requested an administrative amendment (submitted on March 22, 2010). Armstrong proposed to correct a typographical error in the Flooring Mill through-put rate listed in the Emission Unit Table, page 6, Emission Unit ID #003-01, Emission Point ID S04-S11. Actual design capacity should state 18,700 board ft/hr (instead of 10,179 board ft/hr). This change was also reflected in administrative amendment of 45CSR13 permit. The modified 45CSR13 permit R13-1147J was issued on April 1, 2010 and has been incorporated in this title V permit modification.