



west virginia department of environmental protection

Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
Phone: (304) 926-0475

Harold Ward, Cabinet Secretary
dep.wv.gov

FINAL DETERMINATION

for the

Modification

of

**Roxul USA, Inc.
RAN Facility**

located in

Ranson, Jefferson County, WV

**Permit Number: R14-0037A
Facility Identification Number: 037-00108**

Date: October 31, 2023

Promoting a healthy environment.

BACKGROUND INFORMATION

Application No.:	R14-0037A
Plant ID No.:	037-00108
Applicant:	Roxul USA, Inc.
Facility Name:	RAN Facility
Location:	Jefferson County
NAICS Code:	327993
Application Type:	Modification
Received Date:	October 3, 2022, Resubmitted May 22, 2023
Engineer Assigned:	Steven R. Pursley, PE
Fee Amount:	\$4,500
Date Received:	October 3, 2022 (\$1,000); November 2, 2022
Complete Date:	August 08, 2023
Due Date:	November 06, 2023
Applicant Ad Date:	October 5, 2022, republished on May 26, 2023
Newspaper:	<i>The Journal AND The Spirit of Jefferson</i>
UTM's:	Easting: 252.06 km Northing: 4,362.62 km Zone: 18
DAQ Ad Date:	September 06, 2023- <i>Spirit of Jefferson</i>

On the above noted date, the West Virginia Division of Air Quality (DAQ) published a notice of public comment period in the above noted newspaper. On this date, a preliminary determination/fact sheet and draft permit were made available to the applicant, the public, and the Environmental Protection Agency (EPA). Comments were initially required to be submitted by 5:00 PM on October 6, 2023. Included in the publication were time and location information for two public meetings (one in person, one virtual) to be held by DAQ. During the in person public meeting held in Charles Town, WV on September 19, 2023, the Director extended the public comment period to October 23, 2023.

This document will summarize any actions taken as a result of the comments, any changes to the draft permit, and the final determination of the DAQ regarding R14-0037A.

COMMENTS

During the public comment period brief comments were received from the EPA and Roxul. One hundred sixty six (166) written comments were also received from the public. As a result of the virtual public meeting held on September 26, 2023 DAQ also received thirteen (13) oral comments. For a complete response to these comments see DAQs Response to Public Comments document of October 31, 2023. Comments that resulted in changes to the draft permit are discussed below.

EPA Comments

On October 23, 2023, via email, EPA provided 4 comments concerning the draft permit. All four comments were similar, in that they requested language be added to conditions 4.1.4.a, 4.1.5.a, 4.1.8.b and 4.1.9.b to require certain activities that the permit already required to be performed on a schedule dictated by either manufacturer recommendations or good engineering practices.

Additionally, EPA (via phone calls and other emails) asked for clarification on the required stack testing schedules required by the permit.

As a result of the above comments, changes to conditions 4.1.4.a, 4.1.5.a, 4.1.8.b and 4.1.9.b were changed to require certain activities that the permit already required to be performed on a schedule dictated by either manufacturer recommendations or good engineering practices. Additionally, condition 4.3.2 was changed to clarify that the “initial” test, must be performed within 12 months of permit issuance.

Roxul Comments

On October 23, 2023, Roxul submitted several comments. One of the comments was a revision in H₂SO₄ emission calculations from the melting furnace (IMF01). In response to this comment, condition 4.1.4 was changed to reduce H₂SO₄ emissions from the furnace.

Public Comments

During the virtual public meeting on September 26, 2023 and in written comments several commenters requested the following changes be made to the permit:

- * Commenters requested that the permit specifically prohibit the use of coal.

In response to this request, condition 4.1.3 was added to the permit.

- * Commenters requested that clearer permit limits for operational limits and monitoring of those limits be included in the permit.

In response to this request, conditions 4.1.4.e, 4.1.5.d, 4.1.6.d and 4.2.5 were added to the permit.

- * Commenters requested a prohibition of outdoor storage of material and building venting not expressly permitted in the permit.

In response to this request, conditions 4.1.7, 4.1.11, and 4.2.8 were added.

- * One commenter pointed out that although the application indicates a maximum heat input of 9.86 mmbtu/hr from the afterburner (comment actually erroneously states 9.88 mmbtu/hr), draft permit condition 4.1.12.f.1 still referenced the original limit of 6.83 mmbtu/hr.

In response to this comment the MDHI limit in condition 4.1.12.f.1 has been corrected to reference 9.86 mmbtu/hr.

- * Once commenter correctly pointed out that the engineering evaluation and permit applied the pre 1970 45CSR7 mineral acid limits to the facility.

In response to this comment condition 4.1.4 was changed to reflect emissions resulting from the correct requirement.

NOTIFICATIONS

Upon the Director's acceptance of this final determination, the Response to Comments document, the final determination and final permit will be posted on WVDAQs website at:

<https://dep.wv.gov/daq/Pages/NSRPermitsforReviewCurrent.aspx>

Additionally, all commenters will receive a copy of the signed permit and Response to Comments document by email.

FINAL DETERMINATION

It is the view of the writer that, after consideration of all comments received, all available information indicates Roxul USA, Inc's proposed modification of a mineral wool production facility should meet the emission limitations and conditions set forth in the permit and should comply with all currently applicable state and federal air quality management rules and standards. It is, therefore, the recommendation of the undersigned that the WVDEP-DAQ make a final determination to issue the attached permit R14-0037A.

Steven R. Pursley, PE
Engineer

November 1, 2023

R14-0037A
Roxul USA, Inc.
RAN Facility