

# Fact Sheet



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

Permit Number: **R30-04900043-2018**  
Application Received: **September 26, 2018**  
Plant Identification Number: **03-54-049-00043**  
Permittee: **ND Fairmont LLC**  
Facility Name: **Fairmont Facility**  
Mailing Address: **702 AFR Drive, Fairmont, WV 26554**

*Permit Action Number: SM01*

*Revised: March 20, 2019*

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Physical Location:	Fairmont, Marion County, West Virginia
UTM Coordinates:	575.30 km Easting • 4375.10 km Northing • Zone 17
Directions:	From I-79, Exit 137, follow Route 310 North. Stay in right lane to Speedway. Go straight at traffic light. Travel on Speedway (Route 73) for approximately one (1) mile. Just past Novelis turn left on Suncrest Boulevard. Continue straight through four (4)-way stop. Turn left down the hill onto Hout Road. Take an immediate right and follow straight to AFR Drive.

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### Facility Description

ND Fairmont LLC's Fairmont Facility is a de-inked market pulp mill with a SIC code of 2611 and a NAICS code of 322110. Office waste paper is pulped, cleaned of contaminants, washed, and pressed. Ink and adhesives are removed; the pulp is thickened, bleached, dewatered, and dried to form a final pulp sheet. Hydrogen peroxide, sodium hydroxide, sodium silicate, and formamidine sulfonic acid are used in the bleaching processes; chlorine is not. The facility has the potential to operate twenty-four (24) hours per day for seven (7) days per week and fifty-two weeks per year.

This significant modification is based on permit R13-1525D. It was requested by the company in order to become a synthetic minor for HAP emissions.

**Emissions Summary:**

The following emission changes are associated with this modification:

Pollutant	Emission Change (TPY)	Total PTE (TPY)
Volatile Organic Compounds	+13.89	40.85
PM <sub>10</sub>	-1.02	18.95
Sulfur Dioxide	+0.24	0.45
Acetaldehyde	-0.37	2.12
Benzene	0	0.01
Biphenyl	-0.54	3.11
Chloroform	-0.08	0.40
Cumene	-0.05	0.28
Formaldehyde	-0.04	0.64
Hexane	+0.03	1.35
Methanol	-1.72	9.91
Methylene Chloride	-0.11	0.35
Naphthalene	-0.07	0.35
Phenol	-0.21	1.24
Propionaldehyde	-0.03	0.14
Toluene	-0.27	1.56
Total HAPs	-3.46	21.45

**Title V Program Applicability Basis**

With the proposed changes associated with this modification, this facility maintains the potential to emit of 125.3 TPY of CO. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, ND Fairmont LLC 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 modification has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, Permission to Commence Construction, and Procedures for Evaluation
	45CSR30	Operating permit requirement.

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> )
R13-1525D	December 11, 2018	
G60-C099	June 13, 2018	

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. All permits for Fibrek Recycling US, Inc. were transferred to ND Fairmont LLC on October 12, 2018, therefore, the company name on the permit was changed accordingly.
2. There were no physical changes to the facility, therefore no new regulations became applicable.
3. Since the permit R13-1525D was issued in a new format, several revisions of the referenced permit's condition numbers were made.
4. Section 3.0 - requirements 3.1.13 through 3.1.15, and 3.4.9 were added based on Section 4.0 (Source-Specific Requirements) of the underlying permit R13-1525D.
5. Section 4.0 – Boiler 001E emission limits for PM, Sulfur Dioxide and VOCs were revised (requirement 4.1.1), also annual emission limits were added.
6. Section 5.0 – VOC and HAP emission limits were added for the Dryer 002E (requirement 5.1.1) including a methanol limit of 9.91 TPY (< 10 TPY) in order to achieve a synthetic minor status for HAPs. To demonstrate compliance with these emission limits, an annual production limit of 249,000 TPY is set forth in requirement 5.1.9, and a twelve-month rolling total is used as a compliance demonstration method for the production limit. Also, requirements 5.4.2, 5.4.3 and 5.5.1 were added based on R13-1525D in order to demonstrate compliance with requirements 3.1.13 (Minor Source of Hazardous Air Pollutants (HAP)), 5.1.1 and 5.1.9.

### Non-Applicability Determinations

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

1. 40 C.F.R. 63 Subpart DDDDD *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters* - since the Fairmont facility became a synthetic minor for methanol, it is no longer subject to the requirements of this rule. Therefore, Section 7.0 (40 C.F.R. 63 Subpart DDDDD requirements for Boiler 001) was removed from the permit, and a line was added to the Permit Shield Section (requirement 3.7.2) to indicate non-applicability of this subpart.

2. 40 C.F.R. Part 64 – CAM is not applicable because there were no PSEU units added during this modification.

### **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: February 2, 2019  
Ending Date: March 4, 2019

### **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 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1220 • Fax: 304/926-0478  
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)**

The Title V permit boilerplate language (condition 3.5.3, US EPA address) has been revised after this permit went out to notice. Therefore, final version of this permit was changed to include the correct US EPA address.