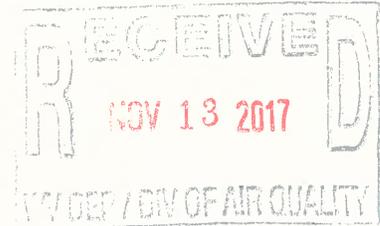




November 9, 2017  
Project No. 17-177

William F. Durham  
Director  
WV Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304



**Transmittal Letter**  
**Title V Permit Renewal Application**  
**Facility ID Number 049-00043**

Dear Mr. Durham,

On behalf of Fibrek Recycling U.S., Inc., MSES Consultants, Inc. is submitting a 45CSR30 (Title V) permit renewal application for the facility located in Fairmont, West Virginia. Please find enclosed one (1) signed hardcopy and two (2) CDs of the permit application package

Please advise if you have any questions or require additional information.

Sincerely,

Lori Steele  
Senior Environmental Scientist

Cc: Erica Hawley – Fibrek

Enclosures

November 2017  
Project No. 17-177

# **REGULATION 30 PERMIT RENEWAL APPLICATION**

**PERMIT NUMBER R30-04900043-2013**

**FIBREK RECYCLING US INC.  
FAIRMONT, WEST VIRGINIA**

**PREPARED BY:**

**MSES Consultants, Inc.  
P.O. Drawer 190  
Clarksburg, West Virginia 26302-0190  
(304) 624-9700**

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## List of Attachments

I. Application

II. Attachments

III. CD

# LIST OF ATTACHMENTS

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A	Area Map
B	Plot Plan
C	Process Flow Diagram(s)
D	Title V Equipment Table
E	Emission Unit Forms
G	Air Pollution Control Device Form



WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF AIR QUALITY

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

www.dep.wv.gov/daq

INITIAL/RENEWAL TITLE V PERMIT APPLICATION - GENERAL FORMS

Section 1: General Information

1. Name of Applicant (As registered with the WV Secretary of State's Office): Fibrek Recycling US Inc.
2. Facility Name or Location: Fairmont Mill
3. DAQ Plant ID No.: 0 4 9 - 0 0 0 4 3
4. Federal Employer ID No. (FEIN): 2 0 5 5 2 4 1 0 4
5. Permit Application Type: [X] Permit Renewal
6. Type of Business Entity: [X] Corporation
7. Is the Applicant the: [X] Both
8. Number of onsite employees: 103
9. Governmental Code: [X] Privately owned and operated; 0
10. Business Confidentiality Claims: [X] No

<b>11. Mailing Address</b>		
Street or P.O. Box: 702 AFR Drive		
City: Fairmont	State: WV	Zip: 26554
Telephone Number: (304) 368-0900	Fax Number: (304) 368-1997	

<b>12. Facility Location</b>		
Street: 702 AFR Drive	City: Fairmont	County: Marion
UTM Easting: 575.30 km	UTM Northing: 4,375.10 km	Zone: <input checked="" type="checkbox"/> 17 or <input type="checkbox"/> 18
<b>Directions:</b> From I-79, Exit 137, follow Route 310 North. Stay in right lane to Speedway Ave. Go straight at traffic light. Travel on Speedway (Route 73) approximately one (1) mile. Just past Novelis turn left onto Suncrest Blvd. Continue straight through 4-way stop. Turn left down the hill onto Hoult Road. Take an immediate right and follow straight to AFR Drive.		
<b>Portable Source?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<b>Is facility located within a nonattainment area?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>If yes, for what air pollutants?</b>	
<b>Is facility located within 50 miles of another state?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>If yes, name the affected state(s).</b> Pennsylvania Maryland	
<b>Is facility located within 100 km of a Class I Area<sup>1</sup>?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>If yes, name the area(s).</b> Dolly Sods Wilderness Otter Creek Wilderness	
<b>If no, do emissions impact a Class I Area<sup>1</sup>?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<sup>1</sup> Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Face Wilderness Area in Virginia.		

<b>13. Contact Information</b>		
<b>Responsible Official:</b> Gerry Clapperton		<b>Title:</b> General Manager
<b>Street or P.O. Box:</b> 702 AFR Drive		
<b>City:</b> Fairmont	<b>State:</b> WV	<b>Zip:</b> 26554-
<b>Telephone Number:</b> (304) 333-6198	<b>Fax Number:</b> (304) 368-1997	
<b>E-mail address:</b> Gerry.Clapperton@resolutefp.com		
<b>Environmental Contact:</b> Ryan Manley		<b>Title:</b> Environmental Manager
<b>Street or P.O. Box:</b> 702 AFR Drive		
<b>City:</b> Fairmont	<b>State:</b> WV	<b>Zip:</b> 26554-
<b>Telephone Number:</b> (304) 333-6169	<b>Fax Number:</b> (304) 368-1997	
<b>E-mail address:</b> ryan.manley@resolutefp.com		
<b>Application Preparer:</b> Lori Steele		<b>Title:</b> Senior Environmental Scientist
<b>Company:</b> MSES Consultants, Inc.		
<b>Street or P.O. Box:</b> P.O. Drawer 190		
<b>City:</b> Clarksburg	<b>State:</b> WV	<b>Zip:</b> 26302-0190
<b>Telephone Number:</b> (304) 624-9700	<b>Fax Number:</b> (304) 622-0981	
<b>E-mail address:</b> lsteel@msesinc.com		

**14. Facility Description**

List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.

Process	Products	NAICS	SIC
Recycled Bleach Kraft Market Pulp	Pulp Sheet	322110	2611

**Provide a general description of operations.**

The facility is a de-inked market pulp mill. 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 sulfinic acid are used in the bleaching processes; chlorine is not. The primary Standard Industrial Classification code is 2611, Pulp Mills.

15. Provide an **Area Map** showing plant location as **ATTACHMENT A**.

16. Provide a **Plot Plan(s)**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as **ATTACHMENT B**. For instructions, refer to "Plot Plan - Guidelines."

17. Provide a detailed **Process Flow Diagram(s)** showing each process or emissions unit as **ATTACHMENT C**. Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

**Section 2: Applicable Requirements**

<b>18. Applicable Requirements Summary</b>	
Instructions: Mark all applicable requirements.	
<input type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input checked="" type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input checked="" type="checkbox"/> NESHAP (45CSR15)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input checked="" type="checkbox"/> Section 111 NSPS	<input type="checkbox"/> Section 112(d) MACT standards
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqts.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64)
<input type="checkbox"/> CAIR NO <sub>x</sub> Annual Trading Program (45CSR39)	<input type="checkbox"/> CAIR NO <sub>x</sub> Ozone Season Trading Program (45CSR40)
<input type="checkbox"/> CAIR SO <sub>2</sub> Trading Program (45CSR41)	

**19. Non Applicability Determinations**

**List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.**

45 CSR 21: Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds. This facility is located in Marion County and is not included in the listed counties.

45 CSR 27: To Prevent and Control the Emissions of Toxic Air Pollutants. This rule does not apply to this facility as it does not emit any of the listed toxic air pollutants.

45 CSR 29: Rule Requiring the Submission of Emission Statements for Volatile Organic Compound Emissions and Oxides of Nitrogen Emissions. This rule applies only to stationary sources located in Putnam, Kanawha, Cabell, Wayne, Wood, and Greenbrier Counties. This facility is located in Marion County; therefore, it is exempt from this rule.

40 C.F.R. 60, Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. This facility does not store volatile organic liquids in storage tanks that meet the requirements of the rule. Additionally, Pulp and Paper facilities are not subject to NSPS Subpart Kb as long as the vessels are flow-through process tanks (per Applicability Determination Index, #9800099).

40 C.F.R. 63, Subpart S: National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry. This facility is not a major source of HAPs; therefore, is it not subject to this rule.

40 C.F.R. 63, Subpart DDDDD: National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial and Institutional Boilers and Porcess Heaters. The facility is not a major source of HAPs.

40 C.F.R. 63, Subpart JJJJJ: National Emission Standards for Hazardous Air Pollutants For Industrial, Commercial, and Institutional Boilers Area Sources. The boiler is gas-fired and not subject to any requirements.

40 C.F.R. 64. The facility does not have any pollutant specific emission units (PSEU) that satisfy all the applicability criteria requirements of Compliance Assurance Monitoring (CAM).

Permit Shield

**20. Facility-Wide Applicable Requirements**

**List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements).**

45CSR6-3.1 Open burning prohibited.

45CSR6-3.2 Open burning exemptions.

40 C.F.R. 61 and 45CSR34 Asbestos.

45CSR4-3.1 State-Enforceable only. Odor.

45CSR13, R13-1252C, Other Requirement B.1 Odor Control Program.

45CSR11-5.2 Standby plan for reducing emissions.

W.Va. Code 22-5-4(a)(14) Emission inventory.

40 C.F.R. 82, Subpart F Ozone-depleting substances.

40 C.F.R. 68 Risk Management Plan.

45CSR13, R13-1525C, A.4 No on-site sludge disposal or composting.

45CSR7-5.2 Particulate matter control.

45CSR13, R13-1525C, C.3 Operate in accordance with permit applications.

Permit Shield

**For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)**

- WV Code 22-5-4(a)(15), 45CSR13, 45CSR7, and 45CSR2 Stack testing.
- 45CSR30-5.1.c.2.A Monitoring information.
- 45CSR30-5.1.c.2.B Retention of records.
- 45CSR30-5.1.c State-Enforceable only. Odors.
- 45CSR13, R13-1525C, Other Requirement B.2 Certified monthly records.
- 45CSR13, R13-1525C, Other Requirement B.3 Certified monthly records.
- 45CSR13, R13-1525C, Other Requirement B.4 Certified monthly records.
- 45CSR13, R13-1525C, Other Requirement B.5 Certified monthly records.
- 45CSR30-5.1.c. Dust suppressant records.
- 45CSR30-4.4 and 5.1.c.3.D Responsible official.
- 45CSR30-5.1.c.3.E. Confidential information.
- 45CSR30-8 Certified emissions statement.
- 45CSR30-5.3.c Compliance certification.
- 45CSR30-5.1.c.3.A Semi-annual monitoring reports.
- 45CSR30-5.1.c.3.C Deviations
- 45CSR30-5.1.c.3.B Report deviations.
- 45CSR30-5.1.c.3.D All reports signed by a responsible official.
- 45CSR30-4-3.h.1.B New applicable requirements.

Are you in compliance with all facility-wide applicable requirements?  Yes  No

If no, complete the **Schedule of Compliance Form** as ATTACHMENT F.

**21. Active Permits/Consent Orders**

Permit or Consent Order Number	Date of Issuance MM/DD/YYYY	List any Permit Determinations that Affect the Permit <i>(if any)</i>
R13-1525C	02/07/2003	none
R30-04900043-2013	06/04/2013	none
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	



**Section 3: Facility-Wide Emissions**

<b>23. Facility-Wide Emissions Summary [Tons per Year]</b>	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	111
Nitrogen Oxides (NO <sub>x</sub> )	81.2
Lead (Pb)	
Particulate Matter (PM <sub>2.5</sub> ) <sup>1</sup>	19.97
Particulate Matter (PM <sub>10</sub> ) <sup>1</sup>	19.97
Total Particulate Matter (TSP)	19.97
Sulfur Dioxide (SO <sub>2</sub> )	0.21
Volatile Organic Compounds (VOC)	2.50
Hazardous Air Pollutants <sup>2</sup>	Potential Emissions
NONE	
Regulated Pollutants other than Criteria and HAP	Potential Emissions
<sup>1</sup> PM <sub>2.5</sub> and PM <sub>10</sub> are components of TSP. <sup>2</sup> For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.	

*Section 4: Insignificant Activities*

<b>24. Insignificant Activities (Check all that apply)</b>	
<input checked="" type="checkbox"/>	1. Air compressors and pneumatically operated equipment, including hand tools.
<input checked="" type="checkbox"/>	2. Air contaminant detectors or recorders, combustion controllers or shutoffs.
<input checked="" type="checkbox"/>	3. Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
<input checked="" type="checkbox"/>	4. Bathroom/toilet vent emissions.
<input checked="" type="checkbox"/>	5. Batteries and battery charging stations, except at battery manufacturing plants.
<input checked="" type="checkbox"/>	6. Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
<input type="checkbox"/>	7. Blacksmith forges.
<input checked="" type="checkbox"/>	8. Boiler water treatment operations, not including cooling towers.
<input checked="" type="checkbox"/>	9. Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
<input checked="" type="checkbox"/>	10. CO <sub>2</sub> lasers, used only on metals and other materials which do not emit HAP in the process.
<input checked="" type="checkbox"/>	11. Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
<input checked="" type="checkbox"/>	12. Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
<input checked="" type="checkbox"/>	13. Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
<input checked="" type="checkbox"/>	14. Demineralized water tanks and demineralizer vents.
<input type="checkbox"/>	15. Drop hammers or hydraulic presses for forging or metalworking.
<input checked="" type="checkbox"/>	16. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
<input type="checkbox"/>	17. Emergency (backup) electrical generators at residential locations.
<input checked="" type="checkbox"/>	18. Emergency road flares.
<input type="checkbox"/>	19. Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO <sub>x</sub> , SO <sub>2</sub> , VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units.  Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis:  _____ _____ _____ _____ _____ _____ _____ _____ _____

<b>24. Insignificant Activities (Check all that apply)</b>	
<input type="checkbox"/>	<p>20. Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27.</p> <p>Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<input type="checkbox"/>	21. Environmental chambers not using hazardous air pollutant (HAP) gases.
<input checked="" type="checkbox"/>	22. Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
<input type="checkbox"/>	23. Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
<input checked="" type="checkbox"/>	24. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
<input checked="" type="checkbox"/>	25. Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
<input checked="" type="checkbox"/>	26. Fire suppression systems.
<input checked="" type="checkbox"/>	27. Firefighting equipment and the equipment used to train firefighters.
<input checked="" type="checkbox"/>	28. Flares used solely to indicate danger to the public.
<input checked="" type="checkbox"/>	29. Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
<input checked="" type="checkbox"/>	30. Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
<input checked="" type="checkbox"/>	31. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
<input type="checkbox"/>	32. Humidity chambers.
<input checked="" type="checkbox"/>	33. Hydraulic and hydrostatic testing equipment.
<input checked="" type="checkbox"/>	34. Indoor or outdoor kerosene heaters.
<input checked="" type="checkbox"/>	35. Internal combustion engines used for landscaping purposes.
<input type="checkbox"/>	36. Laser trimmers using dust collection to prevent fugitive emissions.
<input type="checkbox"/>	37. Laundry activities, except for dry-cleaning and steam boilers.
<input checked="" type="checkbox"/>	38. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
<input checked="" type="checkbox"/>	39. Oxygen scavenging (de-aeration) of water.
<input checked="" type="checkbox"/>	40. Ozone generators.
<input checked="" type="checkbox"/>	41. Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant

<b>24. Insignificant Activities (Check all that apply)</b>	
	owners/operators must still get a permit if otherwise requested.)
<input checked="" type="checkbox"/>	42. Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
<input checked="" type="checkbox"/>	43. Process water filtration systems and demineralizers.
<input checked="" type="checkbox"/>	44. Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
<input checked="" type="checkbox"/>	45. Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
<input checked="" type="checkbox"/>	46. Routing calibration and maintenance of laboratory equipment or other analytical instruments.
<input checked="" type="checkbox"/>	47. Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
<input checked="" type="checkbox"/>	48. Shock chambers.
<input type="checkbox"/>	49. Solar simulators.
<input checked="" type="checkbox"/>	50. Space heaters operating by direct heat transfer.
<input checked="" type="checkbox"/>	51. Steam cleaning operations.
<input checked="" type="checkbox"/>	52. Steam leaks.
<input type="checkbox"/>	53. Steam sterilizers.
<input checked="" type="checkbox"/>	54. Steam vents and safety relief valves.
<input checked="" type="checkbox"/>	55. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
<input checked="" type="checkbox"/>	56. Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
<input checked="" type="checkbox"/>	57. Such other sources or activities as the Director may determine.
<input checked="" type="checkbox"/>	58. Tobacco smoking rooms and areas.
<input checked="" type="checkbox"/>	59. Vents from continuous emissions monitors and other analyzers.

*Section 5: Emission Units, Control Devices, and Emission Points*

<b>25. Equipment Table</b>
Fill out the <b>Title V Equipment Table</b> and provide it as <b>ATTACHMENT D</b> .
<b>26. Emission Units</b>
For each emission unit listed in the <b>Title V Equipment Table</b> , fill out and provide an <b>Emission Unit Form</b> as <b>ATTACHMENT E</b> .
For each emission unit not in compliance with an applicable requirement, fill out a <b>Schedule of Compliance Form</b> as <b>ATTACHMENT F</b> .
<b>27. Control Devices</b>
For each control device listed in the <b>Title V Equipment Table</b> , fill out and provide an <b>Air Pollution Control Device Form</b> as <b>ATTACHMENT G</b> .
For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the <b>Compliance Assurance Monitoring (CAM) Form(s)</b> for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as <b>ATTACHMENT H</b> .

**Section 6: Certification of Information**

**28. Certification of Truth, Accuracy and Completeness and Certification of Compliance**

*Note: This Certification must be signed by a responsible official. The **original**, signed in **blue ink**, must be submitted with the application. Applications without an **original** signed certification will be considered as incomplete.*

**a. Certification of Truth, Accuracy and Completeness**

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

**b. Compliance Certification**

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

**Responsible official (type or print)**

Name: Gerry Clapperton

Title: General Manager

**Responsible official's signature:**

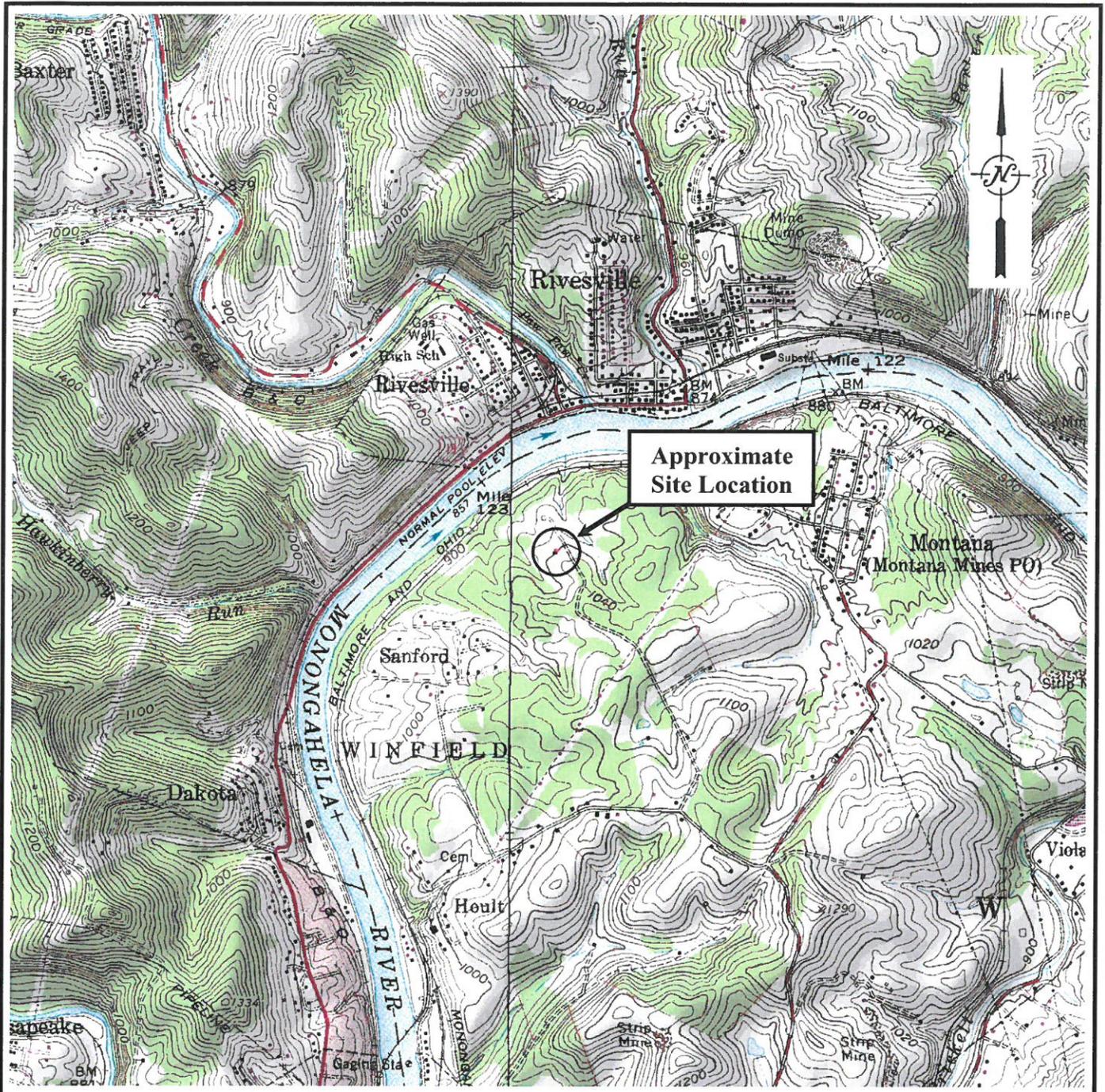
Signature: *Gerry Clapperton* Signature Date: NOV 8, 2017  
(Must be signed and dated in blue ink)

**Note: Please check all applicable attachments included with this permit application:**

<input checked="" type="checkbox"/>	ATTACHMENT A: Area Map
<input checked="" type="checkbox"/>	ATTACHMENT B: Plot Plan(s)
<input checked="" type="checkbox"/>	ATTACHMENT C: Process Flow Diagram(s)
<input checked="" type="checkbox"/>	ATTACHMENT D: Equipment Table
<input checked="" type="checkbox"/>	ATTACHMENT E: Emission Unit Form(s)
<input type="checkbox"/>	ATTACHMENT F: Schedule of Compliance Form(s)
<input checked="" type="checkbox"/>	ATTACHMENT G: Air Pollution Control Device Form(s)
<input type="checkbox"/>	ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s)

**All of the required forms and additional information can be found and downloaded from, the DEP website at [www.dep.wv.gov/dag](http://www.dep.wv.gov/dag), requested by phone (304) 926-0475, and/or obtained through the mail.**

**ATTACHMENT A**  
**Area Map**



Reference:  
 3-D TopoQuads © DeLorme,  
 Yarmouth, Me 04096  
 Source Data:  
 7.5 Minute USGS  
 Topographic Quadrangles

Grant Town, WV  
 Rivesville, WV

### Vicinity Map

Scale 1" = 2000'

*MSES Consultants, Inc.*  
 Clarksburg, West Virginia

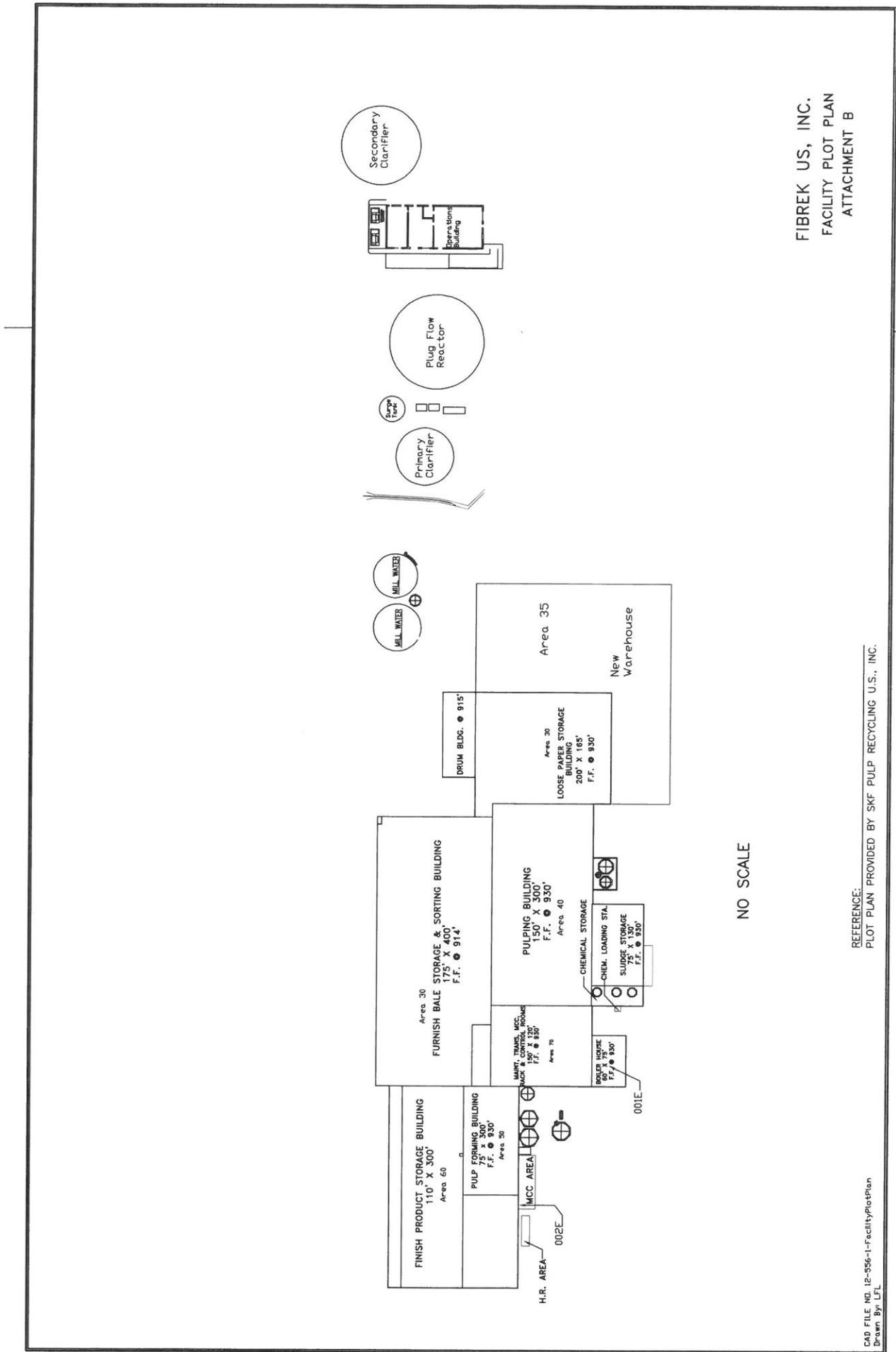
### FibreK Title V Permit Renewal Application

Project No. 17-177

### Attachment A

# **ATTACHMENT B**

## **Plot Plan(s)**



FIBREK US, INC.  
 FACILITY PLOT PLAN  
 ATTACHMENT B

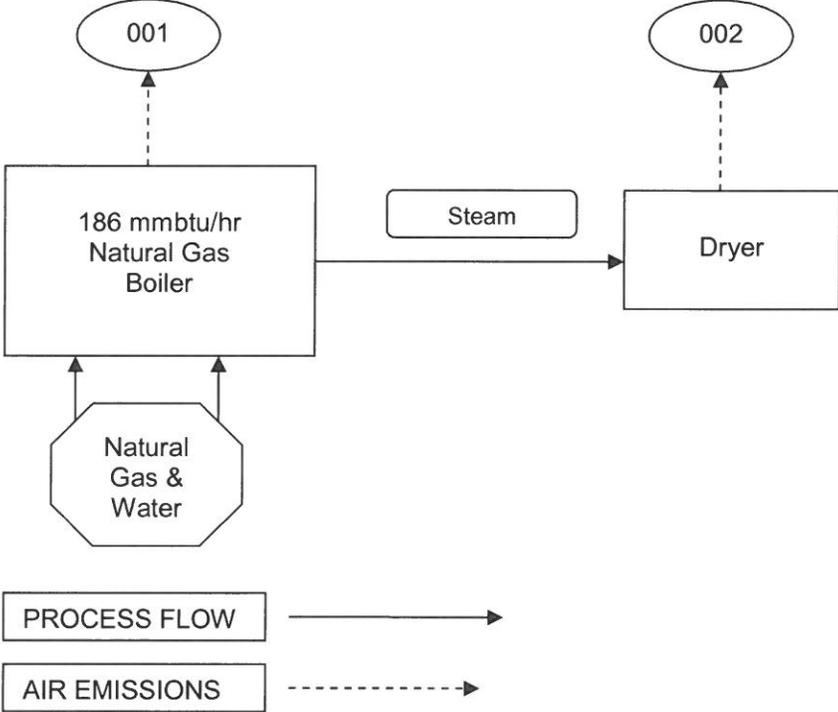
NO SCALE

REFERENCE:  
 PLOT PLAN PROVIDED BY SKF PULP RECYCLING U.S., INC.

# **ATTACHMENT C**

## **Process Flow Diagram(s)**

# BOILER PROCESS FLOW DIAGRAM





# **ATTACHMENT D**

## **Title V Equipment Table**



**ATTACHMENT E**  
**Emission Unit Form(s)**

## ATTACHMENT E - Emission Unit Form

### *Emission Unit Description*

Emission unit ID number: 001	Emission unit name: Natural Gas Boiler	List any control devices associated with this emission unit. COEN low NOx burners/FGR
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):  
Foster Wheeler Limited Model AG-5175 natural gas fueled package boiler.

Manufacturer: Foster Wheeler	Model number: AG-5175	Serial number:
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Construction date: 01/01/1994	Installation date: 01/01/1994	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 186 mmbtu/hr; 150,000 steam @ 180 psig

Maximum Hourly Throughput:	Maximum Annual Throughput:	Maximum Operating Schedule: 8760 hours/year
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### **Fuel Usage Data (fill out all applicable fields)**

Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, is it? <input checked="" type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct
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Maximum design heat input and/or maximum horsepower rating: 186 mmbtu/hr	Type and Btu/hr rating of burners:
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.  
Pipeline quality natural gas

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas		NA	1,000

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	25.33	111
Nitrogen Oxides (NO <sub>x</sub> )	18.55	81.2
Lead (Pb)		
Particulate Matter (PM <sub>10</sub> )	0.56	2.45
Total Particulate Matter (TSP)	0.56	2.45
Sulfur Dioxide (SO <sub>2</sub> )	0.048	0.21
Volatile Organic Compounds (VOC)	0.57	2.50
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Most recent stack test conducted March 7, 2017. Manufacturer's emission factors used for carbon monoxide, particulate matter, sulfur dioxide, and volatile organic compounds. Potential emissions of nitrogen oxides are calculated based on the limit of 0.10 lb/mmBtu in 40 C.F.R. 60 Subpart Db.

**Applicable Requirements**

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

- 45CSR13, R13-1525C, Specific Requirement A.1 Maximum hourly emission limits
- 45CSR13, R13-1525C, Other Requirement B.6 and 45CSR2-3.1 Opacity limits
- 45CSR13, R13-1525C, Other Requirement B.6 and 45CSR2-3.2 Visible emissions compliance
- 45CSR2-4.1.b Particulate matter emission limits
- 45CSR2-4.2 Allowable particulate matter emission rates
- 45CSR2-9.1 Visible emission standards apply at all times except start-ups, shutdowns, and malfunctions.
- 45CSR13, R13-1525C, Other Requirement B.6 and 45CSR2-10.1 Visible emission exceptions
- 45CSR10-3.3 Sulfur dioxide emission limits
- 45CSR16 and 40 C.F.R. 60.44b(a) Nitrogen oxides emission limits
- 40 C.F.R. 60, Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.
- 40 C.F.R. 64, Compliance Assurance Monitoring

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. **(Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)**

- 45CSR13, R13-1525C, Specific Requirement A.3; 45CSR16, 40 C.F.R. 60.48b(b)(1) CEMs for NOx
- 45CSR16 and 40 C.F.R. 60.48b(c) CEMs operation for NOx
- 45CSR16 and 40 C.F.R. 60.48b(d) Calculation of emission rates for NOx
- 45CSR16 and 40 C.F.R. 60.48b(e)(2) Procedures for installing CEMs for NOx
- 45CSR16 and 40 C.F.R. 60.48b(f) Procedures for obtaining emissions when CEMs not available
- 45CSR16 and 40 C.F.R. 60.46b(e) Performance test for NOx monitoring equipment required
- 45CSR16 and 40 C.F.R. 60.46b(e)(4) Calculating rolling 30-day average emission rate for NOx
- 45CSR30-5.1.c. Weekly opacity checks
- 45CSR30.5.1.c. Emission test for carbon monoxide
- 45CSR2-8.3.c Maintain monthly records of operating schedule and quantity and quality of fuel
- 45CSR16 and 40 C.F.R. 60.49b(g)(1-10) Maintain records for NOx
- 45CSR30-5.1.c. Natural gas only fuel combusted
- 45CSR16 and 40 C.F.R. 60.49b(h) Submit quarterly exception reports
- 45CSR16 and 40 C.F.R. 60.49b(i), and 45CSR30-5.1.c. Submit quarterly monitoring reports
- 45CSR2-9.3 Report malfunctions of air pollution control equipment

Are you in compliance with all applicable requirements for this emission unit?  Yes  No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

## ATTACHMENT E - Emission Unit Form

### *Emission Unit Description*

Emission unit ID number: 002	Emission unit name: Flakt Dryer	List any control devices associated with this emission unit. None
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):  
Asea Brown Boveri (ABB) Flakt Dryer

Manufacturer: ABB	Model number:	Serial number:
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Construction date: 01/01/1994	Installation date: 01/01/1994	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 540 Air Dried Metric Tons (ADMT)

Maximum Hourly Throughput: 540 ADMT	Maximum Annual Throughput:	Maximum Operating Schedule: 8760 hours/year
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### **Fuel Usage Data (fill out all applicable fields)**

Does this emission unit combust fuel? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, is it? <input type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct
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Maximum design heat input and/or maximum horsepower rating:	Type and Btu/hr rating of burners:
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO <sub>x</sub> )		
Lead (Pb)		
Particulate Matter (PM <sub>10</sub> )	4	17.52
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Potential emissions based on the manufacturer's emission factor of 4.28 lb of PM per ADMT

**Applicable Requirements**

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

- R13-1525C, Specific Requirement A.2 Particulate matter emission limit
- 45CSR7-3.1 Opacity limits
- 45CSR7-3.2 Opacity limits
- 45CSR7-4.1 Process weight rate particulate matter emission limits
- 45CSR7-4.3
- 45CSR7-9.1 Excess emissions during malfunctions
- 45CSR7-10.3 Maintenance operations exemption
- 45CSR7-10.4 Alternative visible emission standard during start-up and shutdown periods

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. **(Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)**

- 45CSR30-5.1.c Weekly visible emission checks
- 45CSR7-8.1 Stack tests as required by Director
- 45CSR7-4.12
- 45CSR30-5.1.c Keep records of visible emission checks

Note: Applicant requests the weekly visible emission checks requirement (5.2.1) be modified to be consistent with the visible emission requirements (4.3.3) of the boiler (E001).  
Monthly visible emission checks if no visible emissions for 6 consecutive weeks.

Are you in compliance with all applicable requirements for this emission unit?  Yes  No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

## ATTACHMENT E - Emission Unit Form

### *Emission Unit Description*

Emission unit ID number: 003	Emission unit name: Emergency Back Up Generator Engine	List any control devices associated with this emission unit. None
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Natural gas fueled emergency back up generator engine

Manufacturer: Caterpillar	Model number: DG50-2	Serial number: CAT0DG60PT3700140
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Construction date: MM/DD/2017	Installation date: MM/DD/2017	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons):

Maximum Hourly Throughput: 738.1 cuft natural gas	Maximum Annual Throughput: 369,038 cubic feet	Maximum Operating Schedule: 500 hr/yr
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### **Fuel Usage Data (fill out all applicable fields)**

Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, is it? <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct
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Maximum design heat input and/or maximum horsepower rating: 50 kW (67 hp)	Type and Btu/hr rating of burners: NA
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

20.9 cubic meters (738 cubic feet) per hour of pipeline quality natural gas

10.450 cubic meters (369,038 cubic feet) pe year of pipeline quality natural gas

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
natural gas	NA	NA	1015

**Emissions Data**

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	57.21	14.3
Nitrogen Oxides (NO <sub>x</sub> )	1.48	0.369
Lead (Pb)		
Particulate Matter (PM <sub>10</sub> )	0.007	0.0019
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )	0.0004	0.0001
Volatile Organic Compounds (VOC)	included w/NO <sub>x</sub>	included w/NO <sub>x</sub>
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	0.040	0.010
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
Carbon Dioxide (CO <sub>2</sub> )	82.41	20.6
Methane	0.94	0.23

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Manufacturer's data for CO and NO<sub>x</sub>+HC  
 AP-42 for PM, SO<sub>2</sub>, CO<sub>2</sub>, formaldehyde and methane

Annual emissions assume 500 hours per year

**Applicable Requirements**

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

40 C.F.R. 60, Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines  
60.4230(a)(4)(iv) Emergency engines greater than 19 kW manufactured after January 1, 2009.

60.4233(d) Comply with emission standards for emergency SI ICE

40 C.F.R. 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. **(Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)**

60.4237( c ) Install a non-resettable hour meter if engine does not meet standards.

60.4243(d)(1) No limit on usage in emergency situations

60.4243(d)(2) Maximum 100 hours per calendar year for non-emergency use.

60.4245(a) Keep records of notifications submitted, maintenance conducted, certification

60.4245(b) Keep records of hours of operation

Are you in compliance with all applicable requirements for this emission unit?  Yes  No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

# **ATTACHMENT G**

## **Air Pollution Control Device Form**

**ATTACHMENT G - Air Pollution Control Device Form**

<b>Control device ID number:</b> 001C	<b>List all emission units associated with this control device.</b> Foster Wheeler Natural Gas Boiler
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<b>Manufacturer:</b> Coen Company, Inc.	<b>Model number:</b> 495, CPF/LN-35	<b>Installation date:</b> 01/01/1994
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**Type of Air Pollution Control Device:**

<input type="checkbox"/> Baghouse/Fabric Filter	<input type="checkbox"/> Venturi Scrubber	<input type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Adsorber	<input type="checkbox"/> Packed Tower Scrubber	<input type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input type="checkbox"/> Flare	<input checked="" type="checkbox"/> Other (describe) <u>LNB/FGR</u>
<input type="checkbox"/> Wet Plate Electrostatic Precipitator		<input type="checkbox"/> Dry Plate Electrostatic Precipitator

**List the pollutants for which this device is intended to control and the capture and control efficiencies.**

Pollutant	Capture Efficiency	Control Efficiency
NOx	100 %	

**Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).**

**Is this device subject to the CAM requirements of 40 C.F.R. 64?**  Yes  No

If Yes, Complete ATTACHMENT H

If No, Provide justification. R13-1525C limits NOx emissions to less than 100 tpy.

**Describe the parameters monitored and/or methods used to indicate performance of this control device.**

Continuous Emissions Monitoring System for NOx

**CD**