

# Fact Sheet



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

Permit Number: **R30-04900043-2024**  
Application Received: **May 2, 2023**  
Plant Identification Number: **03-54-049-00043**  
Permittee: **ND Fairmont LLC**  
Facility Name: **Fairmont Facility**  
Mailing Address: **702 AFR Drive, Fairmont, WV 26554**

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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 Hoult 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 sulfinic 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 (52) weeks per year.

**Emissions Summary**

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2022 Actual Emissions</b>
Carbon Monoxide (CO)	70.80	0.20
Nitrogen Oxides (NO <sub>x</sub> )	82.82	25.89
Particulate Matter (PM <sub>2.5</sub> )	16.52	7.07
Particulate Matter (PM <sub>10</sub> )	42.09	14.68
Total Particulate Matter (TSP)	48.49	18.49
Sulfur Dioxide (SO <sub>2</sub> )	0.47	0.26
Volatile Organic Compounds (VOC)	58.44	39.59

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2022 Actual Emissions</b>
Acetaldehyde	3.41	2.15
Acrolein	1.52	< 0.01
Benzene	< 0.01	< 0.01
Biphenyl	5.02	3.16
Carbon Disulfide	12.93	0.82
Chloroform	0.65	0.41
Cumene	0.44	0.28
Formaldehyde	0.99	0.62
Glycol Ethers	1.06	0.17
Hexane	1.38	0.78
Methanol	15.98	10.05
Methylene Chloride	0.62	0.36
Naphthalene	0.56	0.36
Phenol	1.99	1.26
Propionaldehyde	2.51	0.15
Toluene	2.51	1.58
Other HAPs	< 0.02	< 0.02
Total HAPs	51.60	22.18

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### Title V Program Applicability Basis

This facility has the potential to emit 15.98 TPY of Methanol, 12.93 TPY of Carbon Disulfide, and 51.6 TPY of total HAPs. Due to this facility's potential to emit over 10 tons per year of a single HAP and over 25 tons per year of total HAPs, 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 facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	To Prevent and Control Particulate Air Pollution from the Combustion of Fuel in Indirect Heat Exchangers
	45CSR6	Open burning prohibited.
	45CSR7	To Prevent and Control Particulate Matter (PM) Air Pollution from Manufacturing Processes and Associated Operations
	45CSR10	To Prevent and Control Air Pollution from the Emission of Sulfur Dioxide
	45CSR11	Standby plans for emergency episodes.
	45CSR13	NSR Permits
	45CSR16	Standards of Performance for New Stationary Sources
	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 Hazardous Air Pollutants
	40 C.F.R. Part 60, Subpart Db	Standard of Performance for Industrial-Commercial-Institutional Steam Generating Units
	40 C.F.R. Part 61, Subpart M	Asbestos inspection and removal
	40 C.F.R. 60, Subpart JJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
	40 C.F.R. 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
	40 C.F.R. 63, Subpart DDDDD	National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial and Institutional Boilers and Process Heaters
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

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> )
R13-1525F	September 8, 2021	
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**

There were no changes to the facility since the latest Title V permit modification (SM03) was issued on November 4, 2021, but the following minor changes to the permit were applied:

1. Permit boilerplate was revised.
2. Condition 3.7.2 (Permit Shield) – non-applicability determination of rule 45CSR27 was revised.
3. Sections 5.0 through 7.0 – typos were corrected, and 40 C.F.R. 60, Subpart JJJJ language was updated.

**Non-Applicability Determinations**

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

1. Permit Shield (Requirement 3.7.2):

<b>45CSR21</b>	<b><i>Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds.</i></b> This facility is located in Marion County and is not included in the listed counties.
<b>45CSR27</b>	<b><i>To Prevent and Control the Emissions of Toxic Air Pollutants.</i></b> The Dryer is the only source of toxic air pollutants (Chloroform and Formaldehyde) emitted in excess of the applicability thresholds of Table A, but it does not meet the definition of a “Chemical Processing Unit” under 45CSR§27-2.4 (nothing is being processed or “added together” within the unit, it is not “utilizing or treating a toxic air pollutant” nor is it "utilizing a toxic air pollutant as a solvent”, except it is driving off the moisture). Therefore, 45CSR27 does not apply.
<b>40 C.F.R. Part 60 Subpart Kb</b>	<b><i>Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.</i></b> 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)
<b>40 C.F.R. Part 63 Subpart S</b>	<b><i>National Emissions Standards for Hazardous Air Pollutants from the Pulp and Paper Industry.</i></b> This facility is a major source of HAPs, and it employs a “process using secondary or non-wood fibers” with a bleaching system that does not use any chlorine or chlorinated compounds. Therefore, they are not subject to any requirements of this subpart.

<b>40 C.F.R. Part 63 Subpart JJJJJ</b>	<i>National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources.</i> Since the Fairmont Facility's boiler is gas fired, it is not subject to 40 C.F.R. Part 63 Subpart JJJJJ according to 40 C.F.R. § 63.11195 (e).
<b>40 C.F.R. Part 64</b>	This is the fourth permit renewal for this facility. The facility was found not to be subject to Compliance Assurance Monitoring (CAM) at the time of the first renewal since the facility did not have any pollutant specific emissions units (PSEU) that satisfied all of the applicability criteria requirements of 40 C.F.R § 64.2 (a). There have been no changes to any PSEUs at the facility since the first renewal that have resulted in a source satisfying the applicability requirements of 40 C.F.R. § 64.2 (a) and becoming subject to CAM.

**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 28, 2024

Ending Date: March 29, 2024

**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. 41250  
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)**

Not applicable.