

# Fact Sheet



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

Permit Number: **R30-04900043-2018**  
Application Received: **November 13, 2017**  
Plant Identification Number: **03-54-049-00043**  
Permittee: **Fibrex Recycling U.S. Inc.**  
Facility Name: **Fairmont Mill**  
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 Hault Road. Take an immediate right and follow straight to AFR Drive.

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### **Facility Description**

Fibrex Recycling U.S. Inc.'s Fairmont Mill 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 weeks per year.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2017 Actual Emissions</b>
Carbon Monoxide (CO)	125.3	0.34
Nitrogen Oxides (NO <sub>x</sub> )	81.57	23
Particulate Matter (PM <sub>2.5</sub> )	19.97	6.49
Particulate Matter (PM <sub>10</sub> )	19.97	16.08
Total Particulate Matter (TSP)	19.97	18.49
Sulfur Dioxide (SO <sub>2</sub> )	0.21	0.20
Volatile Organic Compounds (VOC)	26.96	13.49

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

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2017 Actual Emissions</b>
Acetaldehyde	2.49	1.19
Benzene	0.01	0.01
Biphenyl	3.65	1.75
Chloroform	0.48	0.23
Cumene	0.33	0.16
Formaldehyde	0.68	0.35
Hexane	1.32	0.59
Methanol	11.63	5.55
Methylene Chloride	0.46	0.22
Naphthalene	0.42	0.20
Phenol	1.45	0.70
Propionaldehyde	0.17	0.08
Toluene	1.83	0.88
Total HAPs	24.92	11.91

*Some of the above HAPs may be counted as PM or VOCs.*

### Title V Program Applicability Basis

This facility has the potential to emit 125.3 TPY of CO and 11.63 TPY of Methanol. Due to this facility's potential to emit over 100 tons per year of criteria pollutant and over 10 tons per year of a single HAP, Fibrek Recycling U.S. Inc. 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	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
	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 JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
	40 C.F.R. Part 61	Asbestos inspection and removal
	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> )
R13-1525C	February 7, 2003	
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. Emission Units Table 1.1 – a new backup emergency generator 003 was added (covered by General Permit Registration G60-C099 and General Permit G60-C).
2. Requirement 3.7.2 (Permit Shield) – revised non-applicability of the:
  - 40 C.F.R. Part 63 Subpart ZZZZ – applicable to emergency generator 003 since this is a major source of HAPs;
  - 40 C.F.R. 63 Subpart S – not applicable, but for a different reason (“process using secondary or non-wood fibers” at a major source of HAPs, but with a non-chlorine bleach);
  - 40 C.F.R. 63 Subpart DDDDD – applicable to Boiler 001 since this is a major source of HAPs.
3. Section 4.0 – a recordkeeping section §60.49b(d) of 40 C.F.R. 60 Subpart Db applicable to Boiler 001 was added as new requirement 4.4.3. Old requirement 4.4.3 was re-numbered to “4.4.4”.
4. Section 6.0 - added to include the emergency generator 003 requirements:
  - emission limits per General Permit Registration G60-C099 were included under condition 6.1.1;
  - 40 C.F.R. Part 63 Subpart ZZZZ *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*– the only applicable condition is 40 C.F.R. §63.6590(c): a new stationary RICE is subject to requirements of 40 C.F.R. Part 60 Subpart JJJJ (condition 6.1.2):

Engine	Design Capacity	Ignition	Use/Type	Year installed	Source of HAP emissions
003	67 HP	Spark Ignition (SI)	Emergency Generator	2017 (new)	Major source

- 40 C.F.R. Part 60 Subpart JJJJ *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines* - applicable requirements of the subpart were added based on General Permit Registration G60-C099 and General Permit G60-C. The engine is certified.

- Section 7.0 - added to include requirements of 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* (Boiler MACT) applicable to Boiler 001.

Boiler	Design Capacity	Oxygen trim system?	Fuel	Year installed	Source of HAP emissions
001	186 MMBtu/hr	Yes	Natural gas	1994 (existing)	Major source

Since the previous operating permit renewal was issued (06/04/2013), the facility was identified as a major source of HAPs. According to 40 C.F.R. §63.7495(b), an existing boiler “must comply with this subpart no later than January 31, 2016”. According to 40 C.F.R. §63.7500(e), since the boiler is designed to burn “gas 1 fuels subcategory” (per 40 C.F.R. §63.7499(l)), it is not subject to emission limits in Tables 1 and 2, or 11 through 13, or the operating limits in Table 4 to this subpart. The boiler is subject to work practice standards in Table 3, including a one-time energy assessment and 5-year tune-ups (because it has an oxygen trim system).

### Non-Applicability Determinations

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

- 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> This rule does not apply to this facility as it does not emit any of the listed toxic air pollutants.
<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>	<b><i>National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources.</i></b> Since the Fairmont Mill’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 third 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.
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- 2. 40 C.F.R. 63 Subpart S *National Emissions Standards for Hazardous Air Pollutants from the Pulp and Paper Industry*.** Since the previous operating permit renewal was issued (06/04/2013), the facility was identified as a major source of HAPs. According to the facility description, Fairmont Mill is a de-inked market pulp mill where 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. Based on the description, it was determined that this is categorized as an (a)(3) type of process in 40 C.F.R. §63.440 (“any process using secondary or non-wood fibers”). According to 40 C.F.R. §63.440(b)(2), the affected source is the total of all HAP emission points in the bleaching system. According to 40 C.F.R. §63.445(a), each bleaching system that does not use any chlorine or chlorinated compounds for bleaching is exempt from the requirements of 40 C.F.R. §63.445. Because Fibrex’s bleaching system does not use any chlorine or chlorinated compounds for bleaching, the facility is not subject to any requirements of this Subpart. Therefore, the non-applicability determination in condition 3.7.2 for Subpart S has been updated.

### **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: September 21, 2018  
Ending Date: October 22, 2018

### **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  
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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.