

# Fact Sheet



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

Permit Number: **R30-04900043-2018**  
Application Received: **April 2, 2021**  
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: SM03*

*Revised: November 4, 2021*

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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 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.

This significant modification is based on permit R13-1525F. It was requested by the company to remove the synthetic minor limit on pulp production and HAP emissions. No physical changes to the facility are necessary to increase production.

**Emissions Summary:**

The following emission changes are associated with this modification:

Regulated Pollutants	Pre-SM03 PTE (TPY)	Emission Change (TPY)	Total PTE (TPY)
PM	23.23	25.26	48.49
PM <sub>10</sub>	23.23	18.87	42.10
PM <sub>2.5</sub>	4.28	12.24	16.52
NO <sub>x</sub> *	81.57	1.25	82.82
CO	125.3	-54.50	70.80
SO <sub>2</sub>	0.45	0.02	0.47
VOC*	40.85	17.59	58.44
Hazardous Air Pollutants		Emission Change (TPY)	Total PTE (TPY)
Acetaldehyde	2.12	1.29	3.41
Benzene	< 0.01	0	< 0.01
Biphenyl	3.11	1.90	5.01
Carbon Disulfide	0	12.93	12.93
Chloroform	0.40	0.25	0.65
Cumene	0.28	0.16	0.44
Formaldehyde	0.64	0.35	0.99
Hexane	1.35	0.03	1.38
Methanol	9.91	6.07	15.98
Methylene Chloride	0.35	0.27	0.62
Naphthalene	0.35	0.21	0.56
Phenol	1.24	0.75	1.99
Propionaldehyde	0.14	2.37	2.51
Toluene	1.56	0.95	2.51
Other HAPs	0	< 0.02	< 0.02
<b>Total HAPs</b>	<b>21.45</b>	<b>27.55</b>	<b>49.00</b>

\* In order to be conservative, the NO<sub>x</sub> + HC emissions from the Generator 003 were assumed to be 100% NO<sub>x</sub> for the NO<sub>x</sub> emissions and 100% VOCs for the HC emissions.

**Title V Program Applicability Basis**

With the proposed changes associated with this modification, this facility maintains the potential to emit over 10 tons per year of a single HAP and over 25 tons per year of combined 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 aggregate 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 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,
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	Temporary Permits, General Permits, Permission to Commence Construction, and Procedures for Evaluation
45CSR30	Operating permit requirement.
45CSR34	Emission Standards for Hazardous Air Pollutants
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

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**

The active permits/consent orders affected by this modification are as follows:

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	

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 – Dryer 002 capacity was changed from 540 air dried metric tons per day to 1000 air dried metric tons per day.
2. Section 3.0 - requirement 3.1.13 (Minor Source of Hazardous Air Pollutants) was removed since the Fairmont facility is no longer a synthetic minor for HAPs.
3. Section 4.0 – Boiler 001 emission limits in requirement 4.1.1 were revised based on permit R13-1525F underlying condition 5.1.1. New NO<sub>x</sub> limit in condition 4.1.1 (18.60 lb/hr) is equivalent to 40 C.F.R. §60.44b NO<sub>x</sub> standard in condition 4.1.10, therefore streamlining language in the condition 4.1.10 was left out of this permit.
4. Section 5.0 – Dryer 002 emission limits in requirement 5.1.1 were revised based on permit R13-1525F underlying condition 6.1.1. Also, maximum production limitation was changed from 249,000 air dried metric tons per year to 365,000 air dried metric tons per year based on permit R13-1525F underlying condition 6.1.9.
5. Section 6.0 – minor language revisions for clarity purposes; also, vacated section of condition 6.2.3 (40 C.F.R. 60 Subpart JJJ, §60.4243(d)(2)(ii) and (iii)) was removed.

- Section 7.0 - 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 is no longer a synthetic minor for HAPs, it became subject to the requirements of this rule again. Therefore, Section 7.0 was added to the permit to include 40 C.F.R. 63 Subpart DDDDD requirements for Boiler 001.

**40 C.F.R. 63 Subpart DDDDD applicability for 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

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 conditions of the Permit Shield (condition 3.7.2) have been removed / revised due to the following:
  - Non-applicability section for 40 C.F.R. 63 Subpart DDDDD was removed since the Fairmont facility is no longer synthetic minor for HAPs.
  - Non-applicability determination for 40 C.F.R. Part 63 Subpart S was revised to remove “synthetic minor” status of the Fairmont facility.
  - Non-applicability determination for 40 C.F.R. Part 63 Subpart JJJJJ was revised since the Fairmont facility is no longer a synthetic minor for HAPs.
- 40 C.F.R. Part 64 – there were no PSEU units added during this modification, but there were emission increases of Package Boiler 001 (condition 4.1.1). The only potential PSEU at the facility is the Package Boiler 001 because it is equipped with controls (COEN low NO<sub>x</sub> burners and flue gas recirculation (FGR)) and has emission limits set forth in condition 4.1.1 for PM<sub>10</sub>, SO<sub>2</sub>, VOC, CO and NO<sub>x</sub>, and also a 40 C.F.R. §60.44b NO<sub>x</sub> standard in condition 4.1.10. NO<sub>x</sub> emissions are the only controlled emissions and potentially can be subject to CAM. Since NO<sub>x</sub> is limited by 40 C.F.R. 60 Subpart Db (“emission limitation or standard proposed by Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act”), per 40 C.F.R. §64.2(b)(1)(i) CAM is not applicable. In addition, the exhaust emissions from the Boiler are monitored for concentrations and rates of NO<sub>x</sub> and O<sub>2</sub> utilizing a Continuous Emissions Monitoring System (CEMS) (condition 4.2.1). According to 40 C.F.R. §64.1, CEMS falls under the definition of “Continuous Compliance Determination Method”. Therefore, since there is a Continuous Compliance Determination Method in place, per 40 C.F.R. §64.2(b)(1)(vi) CAM is also not applicable.

**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 15, 2021  
Ending Date: October 15, 2021

### **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 • 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)**

Not applicable.