



west virginia department of environmental protection

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ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.: R13-2543A
Plant ID No.: 079-00008
Applicant: International Fiber Corporation
Facility Name: Nitro Facility
Location: Putnam County
NAICS Code: 325221
Application Type: Modification
Received Date: May 23, 2012
Engineer Assigned: Steven R. Pursley, PE
Fee Amount: \$1,000.00
Date Received: May 30, 2012
Complete Date: June 21, 2012
Due Date: September 19, 2012
Applicant Ad Date: May 30, 2012
Newspaper: *Charleston Gazette*
UTM's: Easting: 426.93 km Northing: 4,254.17 km Zone: 17
Description: Addition of a production line.

DESCRIPTION OF PROCESS

International Fiber Corporation uses a mechanical size reduction process to reduce the fiber length of cellulose fibers for use in food and industrial applications such as pet food, industrial filler, filtration and pharmaceutical processes. The cellulose fibers are received in the form of high-grade purified and bleached cellulose (paper) pulp or cottonseed linter pulp, in the form of rolls or sheets. To process the cellulose fiber IFC has a basic 3 step system:

1. Cut the sheets or rolls with a knife and screen cutter and blow it into a silo.
2. A set amount is then loaded and ground in a ball mill and discharged into a bin.

- A blower is used to discharge the material thru a screened knife cutter to packaging in either bulk bags (300-2,500 lbs) or smaller bags (10-50 lbs).

SITE INSPECTION

No site inspection of the facility was performed. The applicant has acknowledged that the equipment is already on site and in place. However, they have stated that it has not and will not run until the permit is approved. To get to the facility take I-64 west to exit 45. Turn left onto Route 25, make a left on Pickens Road. The facility is the first building on the left.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Emissions from the existing facility (as described in the engineering evaluation for R13-2543) are as follows:

Source	PM ₁₀		PM	
	lb/hr	tpy	lb/hr	tpy
Packer Station	0.21	0.94	0.45	1.97
Truck Trailer Loading	0.57	2.50	1.2	5.26
Bale Grinder (BG)	1.93	8.44	4.05	17.73
Pellet Mill (PM)	0.32	1.41	0.68	2.96
Total	3.03	13.29	6.38	27.92

Emissions from the added production line will be as outlined below. Emissions from the production line itself is based on a vendor estimate using a baghouse outlet grain loading of 0.005 gr/dscf. Haul road emissions were performed by the writer using the standard AP-42 method and information supplied by the applicant.

Source	PM ₁₀		PM	
	lb/hr	tpy	lb/hr	tpy
Process Line Baghouse	0.47	2.02	0.47	2.02
Haul Roads	0.05	0.01	0.23	0.02
Total	0.52	2.03	0.7	2.04

Therefore, total facility wide emissions from the modified facility should be as follows:

Source	PM ₁₀		PM	
	lb/hr	tpy	lb/hr	tpy
Total	3.55	15.32	6.45	29.96

REGULATORY APPLICABILITY

The facility proposed to be permitted under this application R13-2543A is subject to the following state rules (no federal regulations apply):

STATE REGULATIONS

45CSR7: To Prevent and Control Particulate Air Pollution From Manufacturing Process Operations

All emissions (except haul roads obviously) from this process line are vented through the baghouse. Therefore that emission point is subject to the weight rate based emission standard of §45-7-4.1. Based on a process weight rate of 800 pounds per hour and the source being a “type a”, the limit is 0.96 pounds per hour. The applicant has estimated emissions from the baghouse to be 0.47 pounds per hour. Therefore the limit will be met.

45CSR13: Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation.

The facility is subject to 45CSR13 because the new process line is subject to 45CSR7.

45CSR22: Air Quality Management Fee Program

Since potential emissions of all criteria pollutant are less than 100 tons per year and no NSPS or NESHAPs apply the facility is not subject to Title V.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

No non-criteria regulated pollutants will be emitted from this facility.

AIR QUALITY IMPACT ANALYSIS

Since this is a minor source as defined in 45CSR14, no modeling was performed.

MONITORING OF OPERATIONS

In order to determine compliance with the requirements of R13-2543A, the permittee will retain monthly records of the following:

- * Amount of bulk material processed through the production line.
- * Records of opacity monitoring

CHANGES TO PERMIT R13-2543

The permit was put into the newest boilerplate. All of the old conditions were put into section 4 of the permit. All of the new requirements were put section 5 of the permit.

RECOMMENDATION TO DIRECTOR

Information supplied in the application indicates that compliance with all applicable regulations will be achieved. Therefore it is the recommendation of the writer that permit R13-2543A for the modification of a wood pulp fiber plant located in Nitro, be granted to International Fiber Corporation.

Steven R. Pursley, PE
Engineer

July 24, 2012

Fact Sheet R13-2543A
International Fiber Corporation
Nitro Facility