



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

PIEDMONT REGIONAL OFFICE

4949-A Cox Road, Glen Allen, Virginia 23060

(804) 527-5020 Fax (804) 527-5106

www.deq.virginia.gov

Molly Joseph Ward
Secretary of Natural Resources

David K. Paylor
Director

Michael P. Murphy
Regional Director

COMMONWEALTH OF VIRGINIA Department of Environmental Quality Piedmont Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Bear Island Paper WB LLC
10026 Old Ridge Road, Ashland, Virginia
Permit No. PRO50840

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Bear Island Paper WB LLC has applied for a renewal of the Title V Operating Permit for its 10026 Old Ridge Road, Ashland, Virginia facility. The Department has reviewed the application and has prepared a draft renewal of the Title V Operating Permit.

Permit Writer/Permit Contact: Richard O. Stone Date: 09/24/2014
Richard O. Stone
(804) 527-5088

Air Permit Manager: James E. Kyle, P.E. Date: 9/24/2014
James E. Kyle, P.E.

Deputy Regional Director: Kyle War Winter, P.E. Date: 09/23/2014
Kyle War Winter, P.E.

FACILITY INFORMATION

Permittee

Bear Island Paper WB LLC
10026 Old Ridge Road
Ashland, Va. 23005

Facility

Bear Island Paper WB LLC
10026 Old Ridge Road
Ashland, Virginia

County Plant ID Number: 085-0042

NATS Facility Identification Number: 322122

SOURCE DESCRIPTION

SIC Code: 2621- Pulp Mill establishments primarily engage in manufacturing pulp from wood or from other materials, such as rags, linters, wastepaper, and straw. Establishments engaged in integrating logging and pulp mill operations are classified according to the primary products shipped. Establishments engaged in integrated operations of producing pulp and manufacturing paper, paperboard, or products thereof are classified in Industry 2621 if primarily shipping paper or paper products.

The facility manufactures newsprint. The facility mixes newsprint made from trees with recycled paper. Bear Island Paper Company manufacturing facility consists of the following: wood yard, thermomechanical paper mill (TMP), combination boiler, package boiler, wastewater treatment plant, recycle plant, paper mill and supporting operating.

The facility is a Title V major source of Particulate Matter (PM), PM-10, PM-2.5, NO_x, SO₂, CO, and VOC. The source is located in an attainment area for all pollutants.

A RACT Consent Agreement was established on July 12, 1996.

The Department of Environmental Quality (DEQ) issued an administrative amendment to the State Operating Permit on December 10, 2013 (50840-18) that superseded the State Operating Permit issued on August 24, 2012 (50840-17). DEQ issued a Title V permit on January 1, 2005 and it expired on January 1, 2010. Bear Island Paper WB LLC (Bear Island) submitted a renewal application dated June 24, 2009 that was received by DEQ on June 26, 2009. DEQ determined the application was timely and complete on August 19, 2009.

COMPLIANCE STATUS

The last full compliance evaluation (FCE) of this facility was completed November 20, 2013, including a site visit conducted November 6, 2013. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility had not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device Description (PCD)	PCD ID	Pollutant Controlled	Applicable Permit Date
<i>Fuel Burning Equipment: COMBINATION BOILER (B&W) - Unit Ref. #2 - MACT (40 CFR 63, Subpart DDDDD)</i>							
2 (PH-1A)	PHS-1	Babcock & Wilcox Combination Boiler Coal – primary fuel	243 mmBtu/hr	Multi-cyclone and Electrostatic Precipitator	PHC-1A PHC -1B	PM/PM-10	State Operating Permit (SOP) 12/10/13
2 (PH-1B)	PHS-1	Babcock & Wilcox Combination Boiler Bark/Paper Sludge/Wood Chips/Combustion – primary fuel	147.4 mmBtu/hr	Multi-cyclone and Electrostatic Precipitator	PHC-1A PHC -1B	PM/PM-10	SOP 12/10/13
2 (PH-1C)	PHS-1	Babcock & Wilcox Combination Boiler Number 2 Fuel Oil - secondary fuel	243 mmBtu/hr	Multi-cyclone, Electrostatic Precipitator and low sulfur fuels not to exceed 0.2%	PHC-1A PHC -1B	PM, PM-10, SO ₂	SOP 12/10/13
2 (PH-1ABC)	PHS-1	Babcock & Wilcox Combination Boiler Natural Gas – start up, primary fuel	5.2 mmBtu/hr	Multi-cyclone and Electrostatic Precipitator	PHC-1A PHC -1B	PM/PM-10	SOP 12/10/13
2 (PH-1ABC)	PHS-1	Babcock & Wilcox Combination Boiler Propane – start up, primary fuel	12.5 mmBtu/hr	Multi-cyclone and Electrostatic Precipitator	PHC-1A PHC -1B	PM/PM-10	SOP 12/10/13

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device Description (PCD)	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment: PACKAGE BOILER - Unit Ref. #3 – NSPS (40 CFR 60 Subpart Db), MACT (40 CFR 63, Subpart DDDDD)							
3 (PH2-2A)	PHS-2	Package Boiler Natural Gas/Propane Combustion -	243.83 mmBtu/hr	Clean burning fuels	None	PM/PM-10	SOP 12/10/13
3 (PH2-2B)	PHS-2	Package Boiler Number 2 Fuel Oil – secondary fuel	247 mmBtu/hr	Low sulfur fuels, not to exceed 0.2% and low nitrogen fuels, not to exceed 0.3% by weight.	None	SO ₂ & NO _x	SOP 12/10/13
Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device Description (PCD)	PCD ID	Pollutant Controlled	Applicable Permit Date
Wood Yard – Unit Ref. #4							
4 (WY-1A)	Fugitive	Wood Yard	1,600 BDT/day BDT = Bone Dry Tons	None	None	None	SOP 12/10/13
4 (WY-1B) (WY-1Ba., WY- 1B.b, WY-1B.c)	Fugitive	Wood Yard Debarker (1B.a), Chipper (WY- 1B.b), Conveyor (WY-1B.c)	1,600 BDT/day BDT = Bone Dry Tons	None	None	None	SOP 12/10/13
Thermomechanical Pulping Process (TMP) – Unit Ref. #1							
1 (TMP-1)	Fugitive	TMP Entire Wood Fiber Line	942 ADT/Day ADT = Air Dry Tons	-	-	PM/PM-10	SOP 12/10/13
1 (TMP-1A)	TMPS-1A	TMP Latency Transfer Chest and Rejects Chest	942 ADT/Day ADT = Air Dry Tons	TMP Heat Recovery System No. 1	TMPC-1A	VOC Rated at 40.5 %	RACT July 12, 1996 Consent Agreement

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device Description (PCD)	PCD ID	Pollutant Controlled	Applicable Permit Date
1 (TMP-1B)	TMPS-1B	TMP Steam Tubes and Atmospheric Refiners	942 ADT/Day ADT = Air Dry Tons	TMP Heat Recovery System No. 2	TMPC-1B	VOC Rated at 40.5 %	RACT July 12, 1996 Consent Agreement
1 (TMP-1C)	TMPS-1C	TMP Thickener	942 ADT/Day ADT = Air Dry Tons	None	None	None	RACT July 12, 1996 Consent Agreement
1 (TMP-51D)	TMPS-1C	TMP Reject Refiners	942 ADT/Day ADT = Air Dry Tons	None	None	None	RACT July 12, 1996 Consent Agreement
Wastewater Treatment Plant – Unit Ref. #5							
5 (WWTP-1)	Fugitive	Wastewater Treatment Plant – hydraulic cap.	4.2 MGD and 4.8 MGD daily max. MGD = mm gal/day	None	None	None	Letter: Re-rating WWTP June 10, 2002
Paper Mill – Unit Ref. #6							
6 (PM-1A)	VENTS PM 1-12	Paper De-watering, Forming and Drying	39 BDT/hr BDT = Bone Dry Tons	None	None	VOC	
6 (PM-1B)	VENTS PM 1-12	Paper Machine Cleaning	39 BDT/hr BDT = Bone Dry Tons	None	None	VOC	

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device Description (PCD)	PCD ID	Pollutant Controlled	Applicable Permit Date
Recycle Plant – Unit Ref. #7							
7 (RPM01)	Fugitive	Recycle Facility: Drum Pulper, Screens, Flotation Cells, Disc Thickener, Double Wire Press, Post-Flotation, Drum Washer	254 BDT/day - output	None	None	PM/PM-10 & VOC	
Parts Washers (Non-Halogenated Cold Solvent Degreasers) – Unit Ref. #8							
8 (MI-I1)	Fugitive	7 Assorted Parts Washers totaling 266 gallons – Non Halogen – Safety Kleen Services.	266 gallons - Total combined capacity. 2 @ 26 gallons, 3 @ 77 gallons and 2 @ 30 gallons.	None	None	VOC	
Industrial Landfill– Unit Ref. #9							
9 (LF-1)	Fugitive	Landfill surface	None	None	None	PM/PM-10	
Emergency Diesel Engine – Unit Ref #10							
10 (MI-I5)	NA	Emergency Diesel Fire Pump	270 hp	None	None	NOx	

EMISSIONS INVENTORY

A copy of the 2013 Pollution Emissions Report is attached. Emissions are summarized in the following tables.

2013 Facility Criteria Pollutant Emissions in TPY							
Pollutants	PM	PM10	PM2.5	NOx	SO2	CO	VOC
TPY Totals	97.1	95.3	95.3	265.4	335.5	342.3	535.7

2013 Facility Hazardous Air Pollutant Emissions in TPY	
Pollutants	TPY Totals
Acetaldehyde (ACETA)	12.2
Benzene (BZ)	0.03
Beryllium (BEC)	0.001
Chloroform (CLFM)	1.4
Chromium (CRC)	0.01
Formaldehyde (FORM)	0.04
Hydrochloric acid (HCL)	12.1
Manganese (MNC)	0.02
Methyl ethyl ketone (MTETN)	0.4
Methanol (MTHOL)	13.7
Nickel (NIC)	0.01
Ammonia (NH3)	1.1
Hexane (NHEXA)	0.2
Lead (PB)	0.1
Phenol (PHNL)	0.05
Styrene (STYR)	0.01
Methyl chloroform (TCA)	0.03
Total	41.4

CHANGES TO THE TITLE V

In a state operating permit issued on May 17, 2011, DEQ derated the package boiler (Unit Ref. No. 3) from 255 mmBtu/hr to 243.8 mmBtu/hr when burning natural gas or propane and removed the nitrogen dioxide testing requirement. Although still subject to NSPS 40 CFR 60 Subpart Db, the derated 243.8 mmBtu/hr package boiler meets the requirements of Section 60.44b(k). This Section states that a facility is not subject to the NO_x emission limits in Subpart Db if the facility can meet the requirements of Section 60.44b(j)(1),(2),(3) and if the facility is rated at less than 250 mmBtu/hr. The derated 243.8 mmBtu/hr package boiler meets these requirements and the testing requirement was removed from the state operating permit. These changes were incorporated into the Title V Renewal permit.

In a state operating permit issued on May 17, 2011 and amended and superseded on December 10, 2013, DEQ made several changes to the wood yard. At the request of Bear Island, DEQ replaced the debarker, the chipper and the conveyor with a new debarker (Ref. No. WY-1B.a), a new chipper (Ref. No. WY-1B.b) and a new conveyor (Ref. No. WY-1.B.c).

DEQ included compliance assurance monitoring requirement for the thermomechanical pulp mill (TMP - Unit Ref. #1). The TMP is subject to CAM (40 CFR 64) because the mill has an emission limit for an applicable pollutant, it uses a control device (heat exchanger/condenser) to meet the emissions limit and it has uncontrolled emissions greater than the major source threshold.

The B&W combination boiler (Unit Ref. No. 2) and the package boiler (Unit Ref. No. 3) are subject to 40 CFR 63, Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial and Institutional Boilers and Process Heaters. In the Title V permit, DEQ states that these boilers are subject to 40 CFR 63, Subpart DDDDD, also called the Boiler MACT. DEQ did not include any specific requirements of Subpart DDDDD because the compliance date is January 31, 2016 and the Environmental Protection Agency (EPA) on August 5, 2013 granted petitions for reconsideration of certain issues in the Subpart.

DEQ also incorporated various administrative changes from the state operating permit into the Title V.

EMISSION UNIT APPLICABLE REQUIREMENTS

B&W COMBINATION BOILER - Unit Ref. #2 – SUBJECT TO MACT (40 CFR 63 DDDDD)

The B&W combination boiler is not subject to the NSPS – Fossil Fuel Fired Steam Generators (40 CFR 60 subpart D) because the boiler does not meet the 250 mmBtu/hr. rated capacity. The B&W boiler is not subject to 60 CFR 60 Subpart Db because it was constructed before June 19, 1984.

Limitations

The limitation requirements in the Title V renewal include the following:

Applicable Requirements from the 12/10/2013 state operating permit that are listed in the Title V Renewal as: III A. 1, 2, 3, 5, 6, 7, 8, 9 and 10.

Applicable Requirement from the July 12, 1996 RACT Consent Agreement concerning good combustion that is listed in the Title V Renewal as III A. 4.

Applicable Requirement from the state regulation, 9 VAC 5-40-1990 (Standards for Coal Preparation) that is listed in the Title V Renewal as III A. 11.

Monitoring

The monitoring requirements in the Title V renewal include the following:

Applicable Requirements from the 12/10/2013 state operating permit that are listed in the Title V Renewal as: III B. 1 and 2.

Recordkeeping

The recordkeeping requirements in the Title V renewal include the following:

Applicable Requirements from the 12/10/2013 state operating permit that are listed in the Title V Renewal as: III C. 1.

PACKAGE BOILER – Unit Ref. #3 – SUBJECT TO NSPS (40 CFR 60 Db), MACT (40 CFR 63 DDDDD)

Limitations

The limitation requirements in the Title V renewal include the following:

Applicable Requirements from the 12/10/2013 state operating permit that are listed in the Title V Renewal as: IV A. 1, 2, 3, 4 (1996 RACT Consent Agreement), 5, 6, 7, 8 and 9.

Monitoring

The monitoring requirements in the Title V renewal include the following:

Applicable Requirements from the 12/10/2013 state operating permit that are listed in the Title V Renewal as: IV B. 1, 2, 3 and 4.

Recordkeeping

The recordkeeping requirements in the Title V renewal include the following:

Applicable Requirement from the 12/10/2013 state operating permit that is listed in the Title V Renewal as: IV C. 1.

Testing

The testing requirements in the Title V renewal include the following:

Applicable Requirement from the 12/10/2013 state operating permit that is listed in the Title V Renewal as: IV D. 1.

Reporting

The reporting requirements in the Title V renewal include the following:

Applicable Requirement from the state regulation, 9 VAC 5-80-110 (Title V, Permit Content) that is listed in the Title V Renewal as IV E.1.

Applicable Requirements from the 12/10/2013 state operating permit that are listed in the Title V Renewal as: IV E. 2 and 3.

WOOD YARD – Unit Ref. #4

Limitations

The limitation requirements in the Title V renewal include the following:

Applicable Requirement from the state regulations, 9 VAC 5-40-20, 9 VAC 5-40-80, 9 VAC 5-40-300 and 9 VAC 5-50-260 (BACT New and Modified Sources) that are listed in the Title V Renewal as V. A. 1, 2, 3, 4 and 5.

Applicable Requirement from the 12/10/2013 state operating permit that is listed in the Title V Renewal as: V A. 3.

Monitoring

The monitoring requirements in the Title V renewal include the following:

Applicable Requirements from the state regulations 9 VAC 5-80-110, 9 VAC 5-50-50 that are listed in the Title V Renewal as: V B. 1.

Recordkeeping

The recordkeeping requirements in the Title V renewal include the following:

Applicable Requirements from the state regulations 9 VAC 5-80-110, 9 VAC 5-50-50 are listed in the Title V Renewal as: V C. 1.

Thermomechanical Pulp Mill – Unit Ref. #1

Limitations

The limitation requirements in the Title V renewal include the following:

Applicable Requirement from the July 12, 1996 RACT Consent Agreement are listed in the Title V Renewal as VI A. 1, 2, 3, 4, 5, 6, 7 and 8.

Monitoring

The monitoring requirements in the Title V renewal include the following:

Applicable Requirement from the July 12, 1996 RACT Consent Agreement are listed in the Title V Renewal as VI B. 1, 2 and 3.

Recordkeeping

The recordkeeping requirements in the Title V renewal include the following:

Applicable Requirement from the July 12, 1996 RACT Consent Agreement is listed in the Title V Renewal as VI C. 1.

Compliance Assurance Monitoring (CAM)

The thermomechanical pulp mill (Unit Ref. #1) is subject to CAM (40 CFR 64) because the mill has an emission limit for an applicable pollutant, it uses a control device (heat exchanger/condenser) to meet the emissions limit and it has uncontrolled emissions greater than the major source threshold.

Applicable Requirements for CAM are listed in the Title V Renewal as VI D 1, 2, 3, 4, 5, 6, 7, 8 and 9.

40 CFR 63, Subpart S, National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry

The thermomechanical pulp mill (Unit Ref. #1) is subject to 40 CFR 63, Subpart S as a pulp mill that is a major source of hazardous air pollutants. The pulp mill is a mechanical pulp process that has a bleaching system. The source does not use chlorine or chlorinated compounds and therefore has no requirements in Subpart S under 40 CFR 63.445. There are no Subpart S requirements in the permit.

Waste Water Treatment Plant – Unit Ref. #5

Limitations

The limitation requirements in the Title V renewal include the following:

Applicable Requirement from the July 12, 1996 RACT Consent Agreement is listed in the Title V Renewal as VII A. 1.

Monitoring

The monitoring requirements in the Title V renewal include the following:

Applicable Requirements from the state regulations 9 VAC 5-80-110, 9 VAC 5-40-7390 are listed in the Title V Renewal as: VII B. 1.

Recordkeeping

The recordkeeping requirements in the Title V renewal include the following:

Applicable Requirements from the state regulations 9 VAC 5-80-110, 9 VAC 5-40-7390 are listed in the Title V Renewal as: VII C. 1.

Paper Mill (Paper Machine) – Unit Ref. #6

Limitations

The limitation requirements in the Title V renewal include the following:

Applicable Requirements from the state regulations 9 VAC 5-80-110, 9 VAC 5-50-20 are listed in the Title V Renewal as: VIII A. 1 and 2.

Monitoring

The monitoring requirements in the Title V renewal include the following:

Applicable Requirement from the state regulations 9 VAC 5-80-110, 9 VAC 5-50-20 is listed in the Title V Renewal as: VIII B. 1.

Recordkeeping

The recordkeeping requirements in the Title V renewal include the following:

Applicable Requirements from the state regulations 9 VAC 5-80-110, 9 VAC 5-50-20 are listed in the Title V Renewal as: VIII C. 1.

Recycle Plant – Unit Ref. #7

Limitations

The limitation requirements in the Title V renewal include the following:

Applicable Requirements from the state regulations 9 VAC 5-80-110, 9 VAC 5-50-20 are listed in the Title V Renewal as: IX A. 1.

Parts Washer (Non-Halogenated Cold Solvent Degreaser) – Unit Ref. #8

Limitations

The limitation requirements in the Title V renewal include the following:

Applicable Requirements from the state regulations 9 VAC 5-80-110, 9 VAC 5-40-3280 C, 9 VAC 5-40-3290 are listed in the Title V Renewal as: X A. 1, 2, 3, 4, 5 and 6.

Industrial Landfill – Unit Ref. #9

Limitations

The limitation requirements in the Title V renewal include the following:

Applicable Requirements from the state regulations 9 VAC 5-80-110, 9 VAC 5-50-20 are listed in the Title V Renewal as: XI A. 1.

Emergency Diesel Fire Pump – Unit Ref. #10

Limitations

The limitation requirements in the Title V renewal include the following:

Applicable Requirements from the federal regulations 40 CFR 63, Subpart ZZZZ are listed in the Title V Renewal as: XII A. 1.

Applicable Requirements from the state regulations 9 VAC 5-80-110, 9 VAC 5-50-20 are listed in the Title V Renewal as: XII A. 2.

Facility-Wide

Limitations

The limitation requirements in the Title V renewal include the following:

Applicable Requirements from the 12/10/2013 state operating permit are listed in the Title V Renewal as: XIII A. 1, 2, 3 and 4.

Applicable Requirements from the state regulation, 9 VAC 5 Chapter 40,, Rule 2-14 are listed in the Title V Renewal as XIII A. 5.

Recordkeeping

The recordkeeping requirements in the Title V renewal include the following:

Applicable Requirements from the 12/10/2013 state operating permit are listed in the Title V Renewal as: XIII B. 1.

Testing

The testing requirements in the Title V renewal include the following:

Applicable Requirements from the 12/10/2013 state operating permit are listed in the Title V Renewal as: IV C. 1 and 2.

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following appropriate method(s) in accordance with procedures approved by the DEQ,. (9 VAC 5-80-110)

STREAMLINED REQUIREMENTS

The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A 4 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

B. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the "Department of Environmental Quality Agency Policy Statement No. 2-09".

This general condition cite(s) the Article(s) that follow(s):

Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:

9 VAC 5-80-80. Application
9 VAC 5-80-140. Permit Shield
9 VAC 5-80-150. Action on Permit Applications

F. Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

J. Permit Modification

This general condition cites the sections that follow:

9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources
9 VAC 5-80-190. Changes to Permits.
9 VAC 5-80-260. Enforcement.
9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources
9 VAC 5-80-1605. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

This general condition cites the sections that follow:

9 VAC 5-20-180. Facility and Control Equipment Maintenance or Malfunction
9 VAC 5-80-110. Permit Content

Y. Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains a citation from the Code of Federal Regulations that follows:

40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.
40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.
40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.

This general condition cites the regulatory sections that follow:
 9 VAC 5-60-70. Designated Emissions Standards
 9 VAC 5-80-110. Permit Content

STATE ONLY APPLICABLE REQUIREMENTS –

Odor (9 VAC 5 Chapter 40, Article 2)
 State Toxics Rule (9 VAC 5 Chapter 60)

FUTURE APPLICABLE REQUIREMENTS

There are no future applicable requirements.

COMPLIANCE PLAN

There is no compliance plan.

INSIGNIFICANT EMISSION UNITS

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (5-80-720 B)	Rated Capacity (5-80-720 C)
PH-I2	Ash Handling	9 VAC-5-80-720 B	PM/PM-10	
WWTP-I1	Oil and Water Separator	9 VAC-5-80-720 B	VOC	
WWTP-I2	Lime Silo	9 VAC-5-80-720 B	PM/PM-10	
ST-I1	Paper Machine Storage Tanks	9 VAC-5-80-720 C	VOC	< 1,000 gallons
ST-I2	TMP Storage Tanks	9 VAC-5-80-720 B	VOC	
ST-I3	WWTP Storage Tanks	9 VAC-5-80-720 C	PM/PM-10, VOC	< 1,000 gallons
ST-I4	Warehouse Storage Tanks	9 VAC-5-80-720 C	VOC	< 1,000 gallons
ST-I5	Powerhouse Storage Tanks	9 VAC-5-80-720 B	VOC	
ST-I6	Recycle Storage Tanks	9 VAC-5-80-720 B	VOC	
ST-I7	Wood Yard Storage Tanks	9 VAC-5-80-720 C	VOC	< 1,000 gallons
ST-I8	Maintenance Storage Tanks	9 VAC-5-80-720 B	VOC	
MI-I2	Cooling Towers- <u>Non-VOC/Haps</u>	9 VAC-5-80-720 B	-	
MI-I3	Chillers - <u>Non-VOC/Haps</u>	9 VAC-5-80-720 B	-	
MI-I4	Core Cutting Machine/Bevler	9 VAC-5-80-720 B	PM-10	

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (5-80-720 B)	Rated Capacity (5-80-720 C)
MI-I5	Diesel Fire Pump	9 VAC-5-80-720 C	VOC, NOx, CO, SO2, PM-10	
PH-I1	Wood Waste Handling	9 VAC-5-80-720 B	PM10	
PH-I2	Coal Handling	9 VAC-5-80-720 B	PM10	
PH-I3	Ash Handling	9 VAC-5-80-720 B	PM10	
WY-I1	Log Handling	9 VAC-5-80-720 B	PM10	
WY-I2	Chip/Bark/Sludge Handling	9 VAC-5-80-720 B	PM10	
WY-I3	Wind Erosion	9 VAC-5-80-720 B	PM10	
WWTP-I2	Lime Silo	9 VAC-5-80-720 B	PM/PM10	
PH-I4	TGM Steam Turbine	9 VAC-5-80-720 A, B	None	
PH-I5	Ideal Electric Generator (non-combustion)	9 VAC-5-80-720 A, B	None	

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

¹The citation criteria for insignificant activities are as follows:
 9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
 9 VAC 5-80-720 B - Insignificant due to emission levels
 9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit was placed on public notice in the Herald Progress (Ashland) on August 7, 2014. The 30-day state review period (August 7, 2014 to September 8, 2014) ran concurrent with the EPA 45-day comment period (August 7, 2014 to September 22, 2014). The Department of Environmental Quality (DEQ) did not receive any comments during the state or EPA comment period.

Registration Number: 50840

County - Plant ID: 085-00042

Plant Name: Bear Island Paper WB LLC

POLLUTANT EMISSIONS REPORT (PLANT) (Tons/Year)

Parameter List

Pollutant Type: All Pollutants

Years: 2013-2013

	ACETA	ASC	BEC	BZ	CDC	CLFM	CO	COC
2013	12.197	0.007	0.001	0.026	0.001	1.363	342.299	0.000

Registration Number: 50840

County - Plant ID: 085-00042

Plant Name: Bear Island Paper WB LLC

POLLUTANT EMISSIONS REPORT (PLANT) (Tons/Year)

Parameter List

Pollutant Type: All Pollutants

Years: 2013-2013

	CRC	FORM	HCL	HGC	MNC	MTETN	MTHOL	NH3
2013	0.014	0.035	12.079	0.000	0.016	0.369	13.696	1.133

Registration Number: 50840

County - Plant ID: 085-00042

Plant Name: Bear Island Paper WB LLC

POLLUTANT EMISSIONS REPORT (PLANT) (Tons/Year)

Parameter List

Pollutant Type: All Pollutants

Years: 2013 -2013

	NHEXA	NIC	NO2	PAH1	PB	PHNL	PM	PM 10
2013	0.175	0.012	265.399	0.000	0.134	0.049	97.143	95.276

Registration Number: 50840

County - Plant ID: 085-00042

Plant Name: Bear Island Paper WB LLC

POLLUTANT EMISSIONS REPORT (PLANT) (Tons/Year)

Pollutant Type: All Pollutants

Parameter List

Years: 2013 -2013

	PM 2.5	SEC	SO2	STYR	TCA	TOLU	VOC
2013	95.276	0.000	335.450	0.012	0.026	0.000	535.909