



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

PIEDMONT REGIONAL OFFICE

4949A Cox Road, Glen Allen, Virginia 23060

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[www.deq.virginia.gov](http://www.deq.virginia.gov)

Douglas W. Domenech  
Secretary of Natural Resources

David K. Paylor  
Director

Michael P. Murphy  
Regional Director

September 26, 2012

Mr. Bill Cheek  
Plant Manager  
Reynolds Consumer Products, Inc.  
2001 Reymet Road  
Richmond, VA 23237-3798

Location: County of Chesterfield  
Registration No.: 50260

Dear Mr. Cheek:

Attached is a renewal Title V permit to operate your facility pursuant to 9 VAC 5 Chapter 80 of the Virginia Regulations for the Control and Abatement of Air Pollution.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and civil penalty. Please read all conditions carefully.

This approval to operate does not relieve Reynolds Consumer Products, Inc. of the responsibility to comply with all other local, state, and federal permit regulations.

Issuance of this permit is a case decision. The Regulations, at 9 VAC 5-170-200, provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this permit is mailed or delivered to you. Please consult that and other relevant provisions for additional requirements for such requests.

Additionally, as provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal to court by filing a Notice of Appeal with:

Mr. David K. Paylor, Director  
Department of Environmental Quality  
P. O. Box 1105  
Richmond, VA 23218

In the event that you receive this permit by mail, three days are added to the period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for additional information including filing dates and the required content of the Notice of Appeal.

If you have any questions concerning this permit, please contact the regional office at (804) 527-5020.

Sincerely,

Kyle Ivar Winter  
Deputy Regional Director

KIW/SLT/50260\_022\_12.doc

Attachment: Permit

Links: MACT DDDDD: <http://ecfr.gpoaccess.gov/>  
(Directions: select Title 40, click on 63.6580 - 63.8830 and select Subpart DDDDD)  
MACT KK: <http://ecfr.gpoaccess.gov/>  
(Directions: select Title 40, click on 63.600 - 63.1199 and select Subpart KK)

ec: Susan Tripp, Administrative Data Coordinator, OAPP  
Kotur Narasimhan, Point Source Inventory Specialist, Air Data Analysis  
Cathleen Kennedy Van Osten, U.S. EPA, Region III  
Doug Masini, Inspector, Air Compliance



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### Federal Operating Permit Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1, of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300, of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	Reynolds Consumer Products Inc.
Facility Name:	Reynolds Consumer Products Inc.
Facility Location:	2001 Reymet Road Richmond (Chesterfield County), Virginia 23237-3798
Registration Number:	50260
Permit Number:	PRO50260

This permit includes the following programs:

**Federally Enforceable Requirements - Clean Air Act (Pages 3-46)**  
**State Only Enforceable Requirements (Page 47)**

November 5, 2012

Effective Date

November 4, 2017

Expiration Date

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Deputy Regional Director

September 26, 2012

Signature Date

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## **Facility Information**

Permittee  
Reynolds Consumer Products Inc.  
1900 W. Field Court  
Lake Forest, IL 60045

Responsible Official  
Bill Cheek  
Plant Manager

Facility  
Reynolds Consumer Products Inc.  
2001 Reymet Road  
Richmond, VA 23237-3798

Contact Person  
Dennis Krause  
EHS Manager  
(804) 743-6038

**County-Plant Identification Number:** 51-041-00058

**Facility Description:** NAICS 323111 and 322212 – The main operations at Reynolds Consumer Products Inc. include rotogravure printing, cutting and folding cartons and spooling paper (parchment, freezer and panliner). The operations at the plant consist of printing on paper, board and aluminum foil for packaging products. The plant also has the ability print on film and produce thermal and extrusion laminating for packaging products. The plant also can conduct other converting operations such as slitting, die cutting, gluing, etc.

## Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
<b>Fuel Burning Equipment</b>							
1	1	19 Erie City Boiler #SAGOH-A18 #6 (Primary fuel: natural gas, Secondary fuel: #6 fuel oil)	26 MMBtu/hr	–	–	–	– (Grandfathered/existing source)
2	2	20 Erie City Boiler #SAGOH-15 (Primary fuel: natural gas, Secondary fuel: #6 fuel oil)	13.3 MMBtu/hr	–	–	–	– (Grandfathered/existing source)
3	3	21 Erie City Boiler #SAGOH-15 (Primary fuel: natural gas, Secondary fuel: #6 fuel oil)	20.3 MMBtu/hr	–	–	–	– (Grandfathered/existing source)
<b>Process Equipment</b>							
21-1	–	Champlain Press 1 with a 55 inch max. web width for film, foil and paper (1975)	850 ft/min	–	–	–	RACT SIP Consent Order and Agreement (DSE-413-A-86) (Amended 10/86)  RACT SIP Consent Order and Agreement (DSE-414-A-86)

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
21-2	–	Champlain Press 2 for film, foil and paper (pre-1975)	800 ft/min	–	–	–	RACT SIP Consent Order and Agreement (DSE-413-A-86) (Amended 10/86)  RACT SIP Consent Order and Agreement (DSE-414-A-86)
21-3	4	Champlain Press 3 for film, foil and paper (pre-1975)	1,100 ft/min	Smith – Thermal Oxidizer with an estimated 70% capture efficiency and an actual 94% destruction efficiency (controls all stations except the treat station).	CD002	VOC	
21-4	–	Champlain Press 4 for film, foil and paper (pre-1975)	710 ft/min	–	–	–	
21-5	–	ATF Press 6 for film, foil and paper (pre-1975)	800 ft/min	–	–	–	
21-6	–	Champlain/Corsair Press 8 for film, foil and paper (pre-1975)	1,000 ft/min	–	–	–	
21-7	–	Rotomec 71280 Press 9 for film, foil and paper (pre-1975)	620 ft/min	–	–	–	
21-8	–	Champlain/Corsair Press 10 for film, foil and paper (pre-1975)	1,000 ft/min	–	–	–	

<b>Emission Unit ID</b>	<b>Stack ID</b>	<b>Emission Unit Description</b>	<b>Size/Rated Capacity</b>	<b>Pollution Control Device (PCD) Description</b>	<b>PCD ID</b>	<b>Pollutant Controlled</b>	<b>Applicable Permit Date</b>
21-9	–	Champlain/Corsair Press 11 for film, foil and paper (pre-1975)	1,000 ft/min	–	–	–	RACT SIP Consent Order and Agreement (DSE-413-A-86) (Amended 10/86)  RACT SIP Consent Order and Agreement (DSE-414-A-86)
21-10	–	Egan Extruder 1 for film, foil and paper (pre-1975)	1,010 ft/min	–	–	–	
21-11	–	Dilts/Egan Extruder 2 for film, foil and paper (pre-1975)	1,025 ft/min	–	–	–	
21-12	–	Dilts/Egan Tandem Extruder 3 for film, foil and paper (pre-1975)	1,000 ft/min	–	–	–	
23	6	Cerutti rotogravure press (press no. 7) with 8 ink stations (including 1 laminating station, 1 treat station, and 1 wax station) for film, foil and paper with a max. web width: 55 7/8") (1981)	1,000 ft/min	–	–	–	October 29, 1998

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
24	7	Intra Roto Laminator 3 for film, foil and paper (pre-1975)	1,000 ft/min	–	–	–	RACT SIP Consent Order and Agreement (DSE-413-A-86) Amended 10/86  RACT SIP Consent Order and Agreement (DSE-414-A-86)
29	012	Rotomec 73534 Laminator 2 for film, foil and paper with a max. web width: 50" (1995)	Max. Web Width: 50"/(No speed limitation when using inks and coatings that contain no VOCs per Condition No. 7 of the May 15, 2002 permit.)	–	–	VOC	May 15, 2002
30	013	Rotomec 73534 Laminator 2 for film, foil and paper with a max. web width: 50" (1995)	Max. Web Width: 50"/1,000 ft/min (When using non-compliant coating)	Laminator 2 Wheelabrator – Thermal Oxidizer with a permanent total enclosure	CD003	VOC	May 15, 2002
31	14	(12) Upright Faustel/Diamond Metal Edgers for film, foil and paper (pre-1975)	210 units/min (estimated)	–	–	–	–
		Ink Room Mixing	–	–			
		Miscellaneous Clean & Lube	–	–			

<b>Emission Unit ID</b>	<b>Stack ID</b>	<b>Emission Unit Description</b>	<b>Size/Rated Capacity</b>	<b>Pollution Control Device (PCD) Description</b>	<b>PCD ID</b>	<b>Pollutant Controlled</b>	<b>Applicable Permit Date</b>
32-1	015	Progressive Recovery, Inc. (PRI) Three Washing Machines for press parts (1994)	1 cycle/hr except when using low volatile based cleaning solution (4.5% VOC or less), the rating shall be no more than 3 cycles/hour.	Progressive Recovery System – Air to Water Heat Exchanger	CD004-CD006	VOC	May 30, 2001
32-2		Manual Wash Tank (pre-1975)	19.5 sq.ft. open area (15 gallons)	–	–		
32-3		Filter wash tank and glue wash tank.	–	–	–	–	
I01 & I14	014	(2) Aboveground Solvent Storage Tanks (1988)	5,000 gallons (each)	Each listed tank has a submerged fill pipe.	–	VOC	–
I02-I13		(12) Aboveground Solvent Storage Tanks (1988)	3,000 gallons (each)				
I15 & I16		(2) Aboveground Solvent Storage Tanks (1988)	4,000 gallons (each)				
I18		(1) Aboveground Solvent Storage Tank (1988)	10,000 gallons				

## Fuel Burning Equipment Requirements – (emission unit ID#s 1, 2 and 3)

1. **Fuel Burning Equipment Requirements – (emission unit ID#s 1, 2 and 3) - Limitations** - Emissions from the operation of the 26 mmbtu/hr 19 Erie City Boiler SAGOH-A18#6, the 13.3 mmbtu/hr 20 Erie City Boiler SAGOH-15, and the 20.3 mmbtu/hr 21 Erie City Boiler SAGOH-15 (emission unit ID#s 1, 2 and 3) shall not exceed the limits specified below:

### **Emission Unit ID#:1 (26 mmbtu/hr)**

#### PM-10

$$1.0906(26 + 13.3 + 20.3)^{-0.2594} = \underline{0.38} \text{ lbs/mmbtu}$$

#### Sulfur Dioxide

$$\underline{2.64} \text{ lbs/mmbtu}$$

### **Emission Unit#:2 (13.0 mmbtu/hr)**

#### PM-10

$$1.0906(26 + 13.3 + 20.3)^{-0.2594} = \underline{0.38} \text{ lbs/mmbtu}$$

#### Sulfur Dioxide

$$\underline{2.64} \text{ lbs/mmbtu}$$

### **Emission Unit ID#:3 (20.0 mmbtu/hr)**

#### PM-10

$$1.0906(26 + 13.3 + 20.3)^{-0.2594} = \underline{0.38} \text{ lbs/mmbtu}$$

#### Sulfur Dioxide

$$\underline{2.64} \text{ lbs/mmbtu}$$

(9 VAC 5-40-900, 9 VAC 5-40-930 and 9 VAC 5-80-110)

2. **Fuel Burning Equipment Requirements – (emission unit ID#s 1, 2 and 3) - Limitations** - Visible Emissions from each of the boiler stacks shall not exceed 20 percent opacity except for one six-minute period in any one hour of not more than 60 percent opacity. Failure to meet the preceding requirements because of the presence of water vapor shall not be a violation of these requirements.

(9 VAC 5-40-940 and 9 VAC 5-80-110)

3. **Fuel Burning Equipment Requirements – (emission unit ID#s 1, 2 and 3) - Monitoring and Recordkeeping** – The emissions from each of the boilers (emission unit ID#s 1, 2 and 3) shall be observed visually at least once each calendar month [except when burning residual (nos. 4, 5 or 6) oil which shall be increased to weekly

evaluations] for at least a brief time period during normal operations to determine if there are normal visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. Each emissions unit observed having above normal visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded. If any boiler(s) emission unit ID #s: 1, 2 and 3) is/are not operated during the calendar month, then no visible emission needs to be performed along with the records documenting the boilers were not operated during the calendar month.

(9 VAC 5-80-110)

4. **Fuel Burning Equipment Requirements – (emission unit ID#s 1, 2 and 3) - Monitoring and Recordkeeping** – Records shall be maintained of all oils which are burned in the boilers (emission units ID#s: 1, 2 and 3) along with the heat content and sulfur content. A copy of the Purchase Order specification requiring sulfur content  $\leq 2.4\%$  shall be used to demonstrate compliance with the recordkeeping for sulfur content. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110)

5. **Fuel Burning Equipment Requirements – (emission unit ID#s 1, 2 and 3) - Monitoring and Recordkeeping** – The heat content of each oil burned in each of the boilers (emission units ID#s: 1, 2 and 3) shall be inserted into one of the following respective equations, unless the heat content of each oil is documented to be above the respective oils listed (i.e. distillate (#1  $\geq 134,000$  Btu/gal and #2  $\geq 138,000$  Btu/gal), #4 residual oil  $\geq 144,000$  Btu/gal, #5 residual oil  $\geq 146,000$  Btu/gal, and #6 residual oil  $\geq 150,000$  Btu/gal). If the respective oil's heat content is above the previously listed heat contents, it will be presumed the fuel burning equipment is in compliance with the allowable particulate emissions for each fuel burning equipment unit when operating at less than rated capacity as according to 9 VAC 5-40-900 B.2:

Distillate fuel oil:

PM<sub>10</sub> Emission Factor =

$$\underline{2}^* \text{ lb of PM}_{10}/\text{thousand gals} \times (1 \text{ thousand gals}/1,000 \text{ gal.}) = \underline{0.002} \text{ lb of PM}_{10}/\text{gal}$$

No.4 fuel oil:

PM<sub>10</sub> Emission Factor =

$$\underline{7}^* \text{ lb of PM}_{10}/\text{thousand gals} \times (1 \text{ thousand gals}/1,000 \text{ gal.}) = \underline{0.007} \text{ lb of PM}_{10}/\text{gal}$$

No.5 fuel oil:

$$\text{PM}_{10} \text{ Emission Factor} = 9.19(\%S) + 3.22^* = \underline{A} \text{ lb of PM}_{10}/\text{thousand gals} \times (1 \text{ thousand gals}/1,000 \text{ gal.}) = \underline{B} \text{ lb of PM}_{10}/\text{gal}$$

No.6 fuel oil:

PM<sub>10</sub> Emission Factor =

$$10^* \text{ lb of PM}_{10}/\text{thousand gals} \times (1 \text{ thousand gals}/1,000 \text{ gal.}) = \underline{0.010} \text{ lb of PM}_{10}/\text{gal}$$

\*: Or current EPA, AP-42 emission factor.

Distillate fuel oil:

$$1 \text{ gal}/\underline{\text{heat content of fuel}} \text{ (MMBtu)} \times \underline{0.002} \text{ lb of PM}_{10}/\text{gal.}) = \underline{C} \text{ lb of PM}_{10}/\text{MMBtu}$$

No. 4 fuel oil:

$$1 \text{ gal}/\underline{\text{heat content of fuel}} \text{ (MMBtu)} \times \underline{0.007} \text{ lb of PM}_{10}/\text{gal.}) = \underline{C} \text{ lb of PM}_{10}/\text{MMBtu}$$

No. 5 fuel oil:

$$1 \text{ gal}/\underline{\text{heat content of fuel}} \text{ (MMBtu)} \times \underline{B} \text{ lb of PM}_{10}/\text{gal.}) = \underline{C} \text{ lb of PM}_{10}/\text{MMBtu}$$

No. 6 fuel oil:

$$1 \text{ gal}/\underline{\text{heat content of fuel}} \text{ (MMBtu)} \times \underline{0.010} \text{ lb of PM}_{10}/\text{gal.}) = \underline{C} \text{ lb of PM}_{10}/\text{MMBtu}$$

(9 VAC 5-80-110)

6. **Fuel Burning Equipment Requirements – (emission unit ID#s 1, 2 and 3) - Monitoring and Recordkeeping** – The sulfur content as per supplier certification of each oil burned for each of the boilers (emission unit ID #s: 1, 2 and 3) shall be inserted into one of the following respective equations, unless the sulfur content is  $\leq$  2.5%, it will be presumed to be in compliance:

Distillate fuel oil:

$$142(\%S)^* = (\underline{A} \text{ lb of SO}_2/\text{thousand gals}) \times (1 \text{ thousand gals}/1,000 \text{ gal.}) = \underline{B} \text{ lb of SO}_2/\text{gal}$$

No.4 fuel oil:

$$150(\%S)^* = (\underline{A} \text{ lb of SO}_2/\text{thousand gals}) \times (1 \text{ thousand gals}/1,000 \text{ gal.}) = \underline{B} \text{ lb of SO}_2/\text{gal}$$

No.5 or No. 6 fuel oil:

$$157(\%S)^* = (\underline{A} \text{ lb of SO}_2/\text{thousand gals}) \times (1 \text{ thousand gals}/1,000 \text{ gal.}) = \underline{B} \text{ lb of SO}_2/\text{gal}$$

\*: Or current EPA, AP-42 emission factor.

(9 VAC 5-80-110)

7. **Fuel Burning Equipment Requirements – (emission unit ID#s 1, 2 and 3) – Monitoring and Recordkeeping** – The heat content of each oil shipment which is burned in the boilers (emission unit ID#s: 1, 2 and 3) and the results from the respective equation from Condition no. 6 shall be inserted into the following equation to determine compliance with the fuel burning SO<sub>2</sub> standard, unless the sulfur content is ≤ 2.5%, it will be presumed to be in compliance:

Distillate fuel oil or the use of No. 4 or No. 5 or No. 6 fuel oil:  
 $1 \text{ gal/heat content of fuel (MMBtu)} \times \underline{B} \text{ lb of SO}_2\text{/gal.} = \underline{C} \text{ lb of SO}_2\text{/MMBtu}$   
(9 VAC 5-80-110)

**MACT Requirements (MACT DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters) – (emission unit ID#s: 1, 2 and 3)**

8. **MACT Requirements – (emission unit ID#s 1, 2 & 3)** Except as specified in this permit, the facility is to be operated in compliance with Federal requirements under 40 CFR 63, Subpart DDDDD. 40 CFR 63 Subpart DDDDD is applicable to the facility, unless the permittee obtains federally enforceable limits on its facility-wide emissions of hazardous air pollutants (HAPs) to below major-source thresholds prior to the first substantive compliance date.  
(9 VAC 5-80-110, 9 VAC 5-60-20, 40 CFR 63 Subpart A, and 40 CFR 63.7490(a))

**Process Equipment Requirements – (emission unit ID# 23)**

9. **Process Equipment Requirements – (emission unit ID# 23) - Limitations -** Volatile organic compound (VOC) emissions from the printing press no. 7 (emission unit ID# 23) shall be controlled by use of compliant inks (as defined under 9 VAC 5-40-5070) and limiting the VOCs as applied. The printing press shall be provided with adequate access for inspection.  
(9 VAC 5-80-110 and Condition 3 of 10/29/98 Permit)
10. **Process Equipment Requirements – (emission unit ID# 23) - Limitations -** The VOCs as applied for the operation and cleaning of printing press no. 7 (emission unit ID # 23) shall be no more than 96.0 tons per year, calculated monthly as the sum of each consecutive twelve (12) month period. VOCs as applied shall include: 1) the VOC in the inks, coatings, treats, waxes, adhesives, thinners and other surface applications applied to the substrate, and 2) the VOC in any cleaning materials used during a particular production job. VOC emissions from the operation and job

specific cleaning of press no. 7 (emission unit ID # 23) shall be calculated using a material balance (based on recordkeeping as required under AQP-4) of the job-specific materials issued to the job less the job specific materials returned to inventory. The VOC emissions shall be calculated monthly for the total of the previous twelve month period.

(9 VAC 5-80-110 and Condition 4 of 10/29/98 Permit)

11. **Process Equipment Requirements – (emission unit ID# 23) - Limitations -** Visible emissions from printing press no. 7 (emission unit ID# 23) shall not exceed 20% opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

(9 VAC 5-80-110 and Condition 6 of 10/29/98 Permit)

12. **Process Equipment Requirements – (emission unit ID# 23) - Limitations -** Emissions from the operation of printing press no. 7 (emission unit ID# 23) shall not exceed the limits specified below:

Volatile Organic Compounds	507.5 lbs/hr	12,180.0 lbs/day	96.0 tons/yr
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(9 VAC 5-80-110 and Condition 5 of 10/29/98 Permit)

13. **Process Equipment Requirements – (emission unit ID# 23) - Recordkeeping -** The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Piedmont Regional Office. These records shall include, but are not limited to:

- a. Records demonstrating inks used meet the definitions in 9 VAC 5-40-5070 of compliant ink.
- b. Daily records demonstrating compliance with the requirements in Air Quality Program Policies and Procedures document # AQP-4, Procedures for Maintaining Records for Surface Coating Operations and Graphic Arts Printing Processes states the following.

- 1. The owner shall maintain the following information at all times:

- a. Coating application system number.
- b. Hours of operation per day and per year.
- c. Method of application.
- d. Number and types of coats applied to the substrate.
- e. Drying method.
- f. Substrate type.

- 2. The owner shall maintain the following information for **each coating** at all times:

- a. Supplier name, coating name and identification number.
  - b. Coating density (pounds per gallon).
  - c. Volatile content of coating as supplied (percent by weight).
  - d. Water content of coating as supplied (percent by weight).
  - e. Exempt solvent content of coating as supplied (percent by weight).
  - f. Solids content of coating as supplied (percent by volume)
  - g. Name of diluents added, if any.
  - h. Identification number of diluent.
  - i. Diluent volatile organic compound density (pounds per gallon).
  - j. Volatile organic compound content of diluent (percent by weight).
  - k. Exempt solvent content of diluents (percent by weight).
  - l. Diluent/coating ratio (gallon diluents per gallon coating).
3. The owner shall maintain the following information for **each coating application system** on a **daily** basis:
- a. Coating application system number.
  - b. Time period of each application run.
  - c. Coating identification number.
  - d. Amount of coating used.
  - e. Diluent and clean up solvent identification numbers.
  - f. Amount of diluent used.
  - g. Amount of clean up solvents used.
  - h. Calculated volatile organic compound emissions.
4. Additional recordkeeping requirements for surface coating operations with add-on control systems.
- a. The owner shall maintain the following information at all times:
    - (1) Control device identification number and model number.
    - (2) Manufacturer.
    - (3) Installation date.
    - (4) Coating application systems controlled.
    - (5) Whether or not the control device is always in operation when the system it is serving is in operation.
    - (6) Type of control device.
    - (7) Destruction or removal efficiency.
    - (8) Date tested (if not tested, method of determining destruction efficiency).
    - (9) Design combustion temperature (degrees Fahrenheit) for thermal incinerators.

- (10) Design exhaust gas temperature (degrees Fahrenheit), design temperature rise across catalyst bed (degrees Fahrenheit), and anticipated frequency of catalyst change for catalytic incinerators.
  - (11) Design inlet temperature of cooling medium (degrees Fahrenheit) and design exhaust gas temperature (degrees Fahrenheit) for a condenser.
  - (12) Design pressure drop across the adsorber at breakthrough, specific volatile organic compound species analyzed, and its concentration at breakthrough for a carbon adsorber.
  - (13) Emission test results, including inlet volatile organic compound concentration (parts per million), outlet VOC concentration (parts per million), method of concentration determination, and date of determination.
  - (14) Type and location of capture system.
  - (15) Capture efficiency (percent).
  - (16) Method of determining capture efficiency.
- c. Monthly material balance of VOCs used at Printing Press no. 7, to include:
- (1) VOCs as applied (as defined in condition no. 10) used in press no. 7 (emission unit ID# 23);
  - (2) Calculation of emissions.
- d. Total of the previous twelve months' emissions.
- e. Records required in condition 13.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-50-50, 9 VAC 5-80-110 and Condition 7 of 10/29/98 Permit)

### **Process Equipment Requirements – (emission unit ID#s 29 – 30)**

14. **Process Equipment Requirements – (emission unit ID#s 29 and 30) - Limitations**  
- Volatile organic compound (VOC) emissions from the No. 2 Laminator (emission unit ID# 30) printing/coating stations, when applying non-compliant inks and coatings (i.e., those not meeting the criteria in 9 VAC 5-40-5080 A.1., 2. or 3., and required to install an emissions control system) shall be controlled by a 100 percent efficient capture system and a thermal oxidizer having a minimum destruction

efficiency of 96.5 percent. The No. 2 Laminator (emission unit ID# 30) and the thermal oxidizer shall be provided with adequate access for inspection.

(9 VAC 5-80-110 and Condition 3 of 5/15/02 Permit)

**or**

Volatile organic compound (VOC) emissions from the No. 2 Laminator (emission unit ID# 29) printing/coating stations shall be controlled by the use of compliant inks and coatings (those meeting criteria of 9 VAC 5-40-5080 A.1., 2. or 3.)

(9 VAC 5-80-110 and Condition 3 of 5/15/02 Permit)

15. **Process Equipment Requirements – (emission unit ID# 29) - Limitations –**  
During periods when compliant inks and coatings are used, Reynolds Consumer Products Inc. shall be permitted to exhaust the individual station(s) to atmosphere. Compliant inks and coatings shall be determined on an “as applied” basis per station. Averaging of the VOC content of the inks and coatings across stations to comply with 9 VAC 5-40-5080 A.1., 2. or 3. is not permitted. No thermal oxidizer efficiency shall be applied to the compliant ink usage. These emissions shall not be credited to the oxidizer. The emissions shall be accounted for in the daily recordkeeping to determine compliance with emission limits specified in condition 21.  
(9 VAC 5-80-110 and Condition 4 of 5/15/02 Permit)
16. **Process Equipment Requirements – (emission unit ID# 30) - Limitations -** The thermal oxidizer (associated with emission unit ID# 30) shall maintain a minimum combustion zone temperature of 1400°F and a minimum retention time of 0.5 seconds. The thermal oxidizer shall be equipped with a device to continuously measure the temperature of the combustion zone and an indication of date and time.  
(9 VAC 5-80-110 and Condition 5 of 5/15/02 Permit)
17. **Process Equipment Requirements – (emission unit ID# 30) - Limitations –** Each total enclosure of the capture system shall meet the following criteria:
  - a. Any natural draft openings shall be at least four equivalent opening diameters from each VOC emitting point;
  - b. The total area of all natural draft openings shall not exceed five percent of the surface area of the enclosure’s four walls, floor and ceiling;
  - c. The average facial velocity of air through the natural draft openings shall be at least 200 feet per minute and the direction of flow shall be into the enclosure.
  - d. All access doors and windows shall be closed during routine operation of the laminator printing/coating stations.

(9 VAC 5-80-110 and Condition 6 of 5/15/02 Permit)

18. **Process Equipment Requirements – (emission unit ID#s 29 and 30) - Limitations**  
– The approved auxiliary fuels for the dryers and the thermal oxidizer is natural gas and a propane/air mixture. A change in the fuel may require a permit to modify and operate.  
(9 VAC 5-80-110 and Condition 8 of 5/15/02 Permit)
19. **Process Equipment Requirements – (emission unit ID#s 29 and 30) - Limitations**  
– The No. 2 Laminator (emission unit ID# 30) shall operate at a maximum speed of 1,000 feet per minute while using inks and coatings that contain volatile organic compounds. There shall be no speed limitation while the No. 2 Laminator (emission unit ID# 29) is using inks and coatings that contain no volatile organic compounds.  
(9 VAC 5-80-110 and Condition 7 of 5/15/02 Permit)
20. **Process Equipment Requirements – (emission unit ID#s 29 and 30) - Limitations**  
– Visible emissions from the No. 2 Laminator (emission unit ID# 29 and 30) process shall not exceed 20% opacity except during one six-minute period in any one hour in which visible emission shall not exceed 30% opacity.  
(9 VAC 5-80-110 and 9 VAC 5-50-80)
21. **Process Equipment Requirements – (emission unit ID#s 29 and 30) - Limitations**  
- Emissions from the operation of the No. 2 Laminator (emission unit ID# 30) shall not exceed the limits specified below:  
Volatile Organic 57.5 lbs/hr 1,380 lbs/day 29.6 tons/yr  
Compounds  
(9 VAC 5-80-110, and Condition 9 of 5/15/02 Permit)
22. **Process Equipment Requirements – (emission unit ID# 30) - Monitoring** - The thermal oxidizer (associated with emission unit ID# 30) shall maintain a minimum combustion zone temperature of 1400°F and a minimum retention time of 0.5 seconds. **The thermal oxidizer shall be equipped with a device to continuously measure the temperature of the combustion zone and an indication of date and time.**  
(9 VAC 5-80-110 and Condition 5 of 5/15/02 Permit)
23. **Process Equipment Requirements – (emission unit ID# 30) - Compliance Assurance Monitoring (CAM)** - The permittee shall monitor, operate, calibrate and maintain the thermal oxidizer controlling the Laminator #2 according to the following:

<b>Monitoring, Frequency, Records</b>	<b>Performance Criteria</b>	<b>Indicator Range; Averaging Period</b>
A circular paper chart records temperature data continuously and temperature data is also recorded electronically to a backup disk system.	Thermal oxidizer combustion chamber temperature measured by a temperature sensor/thermocouple	Combustion chamber temperature must be maintained at a minimum of 1400°F and minimum combustion zone retention time is 0.5 seconds.  The set point for the interlock shall be set at 1410°F. If the oxidizer temperature falls below 1410°F, the interlock shuts down the laminator.
Differential pressure meters are installed at each enclosure, each one has an accuracy rating of +/- 1% full scale.	100% capture efficiency maintained by existence of a permanent total enclosure (PTE).	A differential pressure drop of less than 0.007 inches W.C. which occurs for greater than five minutes activates an audible alarm which requires immediate corrective action.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.6 (c))

24. **Process Equipment Requirements – (emission unit ID# 30) - Compliance Assurance Monitoring (CAM)** - The permittee shall conduct the monitoring and fulfill the other obligations specified in 40 CFR 64.7 through 40 CFR 64.9.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.6 (c))

25. **Process Equipment Requirements – (emission unit ID# 30) - Compliance Assurance Monitoring (CAM)** - At all times, the permittee shall maintain the monitoring equipment, including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7 (b))

26. **Process Equipment Requirements – (emission unit ID# 30) - Compliance Assurance Monitoring (CAM)** - Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the Laminator #2 is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of compliance assurance monitoring,

including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by inadequate maintenance or improper operation are not malfunctions.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7 (c))

27. **Process Equipment Requirements – (emission unit ID# 30) - Compliance Assurance Monitoring (CAM)** - Upon detecting an excursion or exceedance, the permittee shall restore operation of the Laminator #2 (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup and shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator, designated condition, or below the applicable emission limitation or standard, as applicable.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7 (d)(1))

28. **Process Equipment Requirements – (emission unit ID# 30) - Compliance Assurance Monitoring (CAM)** - Determination that acceptable procedures were used in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7(d)(2))

29. **Process Equipment Requirements – (emission unit ID# 30) - Compliance Assurance Monitoring (CAM)** - If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Director, Piedmont Regional Office and, if necessary, submit a proposed modification to this permit to address the necessary monitoring

changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7(e))

30. **Process Equipment Requirements – (emission unit ID# 30) - Compliance Assurance Monitoring (CAM)** - If the number of exceedances or excursions exceeds 5 percent duration of the operating time for the Laminator #2 for a semiannual reporting period, the permittee shall develop, implement and maintain a Quality Improvement Plan (QIP) in accordance with 40 CFR 64.8. If a QIP is required, the permittee shall have it available for inspection. The QIP initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the permittee shall modify the plan to include procedures for conducting one or more of the following, as appropriate:

- a. Improved preventative maintenance practices;
- b. Process operation changes;
- c. Appropriate improvements to control methods;
- d. Other steps appropriate to correct control performance; and
- e. More frequent or improved monitoring.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.8(a) and (b))

31. **Process Equipment Requirements – (emission unit ID#s 29 and 30) - Recordkeeping** - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Piedmont Regional Office. These records shall include, but are not limited to:

- a. Daily records demonstrating compliance with the requirements in Air Quality Program Policies and Procedures, Number AQP-4 (*See Condition 13b.*).
- b. Continuous thermal oxidizer (associated with emission unit ID# 30) combustion zone temperature records, indicating date and time.
- c. Records demonstrating compliant inks and coatings, as applied, meet the criteria in 9 VAC 5-40-5080 A1., 2. or 3.
- d. Annual VOC emission calculations, calculated monthly as the sum of each consecutive twelve (12) month period.
- e. Inventory of spare parts to minimize durations of air pollution control equipment breakdowns.

- f. Written operating procedures for all air pollution control equipment.
- g. Operator training records.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-50-50, 9 VAC 5-80-110 and Condition 11 of 5/15/02 Permit)

- 32. **Process Equipment Requirements – (emission unit ID# 29) – Compliance Assurance Monitoring (CAM) Recordkeeping** – The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan (QIP) required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan (QIP), and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).  
  
(9 VAC 5-80-110 E and 40 CFR 64.9(b))
- 33. **Process Equipment Requirements – (emission unit ID# 29) - Testing** - The DEQ may require testing to determine if compliant ink meets the definition of compliant ink contained in 9 VAC 5-40-5070 of the Regulations.  
  
(9 VAC 5-80-110 and Condition 10 of 5/15/02 permit)
- 34. **Process Equipment Requirements – (emission unit ID# 29) - Compliance Assurance Monitoring (CAM) Reporting** – The permittee shall submit CAM reports as part of the Title V semi-annual monitoring reports required by General Condition 94 of this permit to the Director, Piedmont Regional Office. Such reports all include at a minimum:
  - a. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
  - b. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
  - c. A description of the actions taken to implement a quality improvement plan (QIP) during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

(9 VAC 5-80-110 F and 40 CFR 64.9(a))

## **Process Equipment Requirements – (emission unit ID#s 32-1, 32-2 and 32-3)**

35. **Process Equipment Requirements – (emission unit ID# 32-1) - Limitations -** VOC emissions from the press parts washing machines (emission unit ID# 32-1) shall be controlled by a condenser recovery system. The unit shall be equipped with a temperature gauge. The unit shall be provided with adequate access for inspection.  
(9 VAC 5-80-110 and Condition 3 of 5/30/01 Permit)
36. **Process Equipment Requirements – (emission unit ID# 32-1) - Limitations -** The operating rate of the three parts washing machines shall not exceed 1 cycle/hour, per washing machine, when using a solvent based (greater than 4.5% VOC) wash solution. The operating rate of the three press parts washing machines shall not exceed 3/cycles/hour, per washing machine, when using low solvent (4.5% VOC or less), based cleaning solution.  
(9 VAC 5-80-110 and Condition 4 of 5/30/01Permit)
37. **Process Equipment Requirements – (emission unit ID#s 32-1 and 32-2) - Limitations –** Except as specified in this permit, the solvent metal cleaning operation (emission unit ID#s 32-1 and 32-2) is to be operated in compliance with (Rule 4-24) of State Regulations.  
(9 VAC 5-80-110 and Condition 5 of 5/30/01 Permit)
38. **Process Equipment Requirements – (emission unit ID# 32-3) - Limitations -** The water-based cleaning operations at the filter wash tank and the glue wash tank (emission unit ID# 32-3) shall be soap and water. A change in the operation may require a permit to modify and operate.  
(9 VAC 5-80-110 and Condition 6 of 5/30/01 Permit)
39. **Process Equipment Requirements – (emission unit ID# 32-1) - Limitations -** The solvents used in the press parts washing machines (emission unit ID# 32-1) shall contain no hazardous air pollutants (HAP) greater than one percent by weight. A change in the solvent HAP content may require a permit to modify and operate.  
(9 VAC 5-80-110 and Condition 7 of 5/30/01 Permit)
40. **Process Equipment Requirements – (emission unit ID#s 32-1 and 32-2) - Limitations -** The three press parts washing machines (emission unit ID# 32-1) shall use no more than 53 tons volatile organic compounds (VOC) per year, calculated as the sum of each consecutive 12 month period. The manual wash tank (emission unit ID# 32-2) shall use no more than 20 tons VOC per year, calculated as the sum of the each consecutive 12 month period. The total use for the solvent metal cleaning operation (emission unit ID#s 32-1 and 32-2) shall not exceed 73 tons VOC per year, calculated as the sum of each consecutive 12 month period.  
(9 VAC 5-80-110 and Condition 9 of 5/30/01 Permit)

41. **Process Equipment Requirements – (emission unit ID# 32-1) - Limitations -**  
 Visible emissions from the condenser recovery system process (associated with emission unit ID# 32-1) shall not exceed 20% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30% opacity.  
 (9 VAC 5-50-80 and 9 VAC 5-80-110)
42. **Process Equipment Requirements – (emission unit ID# 32-1) - Limitations -**  
 Emissions from the operation of the three press parts washing machines (emission unit ID# 32-1) shall not exceed the limits specified below:  
 Volatile Organic 15.7 lbs/hr 53 tons/yr  
 Compounds  
 (9 VAC 5-80-110 and Condition 10 of 5/30/01 Permit)
43. **Process Equipment Requirements – (emission unit ID# 32-2) - Limitations -**  
 Emissions from the operation of the manual wash tank (emission unit ID# 32-2) shall not exceed the limits specified below:  
 Volatile Organic 4.6 lbs/hr 20 tons/yr  
 Compounds  
 (9 VAC 5-80-110 and Condition 11 of 5/30/01 Permit)
44. **Process Equipment Requirements – (emission unit ID#s 32-1 and 32-2) – Limitation (Standard), Monitoring and Recordkeeping -** Except as specified in this permit, the solvent metal cleaning operation (emission unit ID# 032-1 and 032-2) is to be operated in compliance with (Rule 4-24) of State Regulations.  
 (9 VAC 5-80-110 and Condition 5 of 5/30/01Permit)
45. **Process Equipment Requirements – (emission unit ID# 32-1) - Compliance Assurance Monitoring (CAM) -** The permittee shall monitor, operate, calibrate and maintain the condenser recovery system controlling the press parts washing machines according to the following:

<b>Monitoring, Frequency, Records</b>	<b>Performance Criteria</b>	<b>Indicator Range; Averaging Period</b>
Temperature gauge readings shall be recorded continuously and will be kept onsite for a minimum of five years.	Chiller water supply temperature shall be measured using a temperature gauge.	Temperature shall be maintained at or below 60°F (while the washing machines are operating). An interlock shall prevent each machine from operating when chill water supply is above 60°F.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.6 (c))

46. **Process Equipment Requirements – (emission unit ID# 32-1) - Compliance Assurance Monitoring (CAM)** - The permittee shall conduct the monitoring and fulfill the other obligations specified in 40 CFR 64.7 through 40 CFR 64.9.  
(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.6 (c))
47. **Process Equipment Requirements – (emission unit ID# 32-1) - Compliance Assurance Monitoring (CAM)** - At all times, the permittee shall maintain the monitoring equipment, including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.  
(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7 (b))
48. **Process Equipment Requirements – (emission unit ID# 32-1) - Compliance Assurance Monitoring (CAM)** - Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the three press parts washing machines are operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of compliance assurance monitoring, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by inadequate maintenance or improper operation are not malfunctions.  
(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7 (c))
49. **Process Equipment Requirements – (emission unit ID# 32-1) - Compliance Assurance Monitoring (CAM)** - Upon detecting an excursion or exceedance, the permittee shall restore operation of the press parts washing machines (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup and shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator, designated condition, or below the applicable emission limitation or standard, as applicable.  
(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7 (d)(1))

50. **Process Equipment Requirements – (emission unit ID# 32-1) - Compliance Assurance Monitoring (CAM)** - Determination that acceptable procedures were used in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.  
(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7(d)(2))
51. **Process Equipment Requirements – (emission unit ID# 32-1) - Compliance Assurance Monitoring (CAM)** - If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Director, Piedmont Regional Office and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.  
(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7(e))
52. **Process Equipment Requirements – (emission unit ID# 32-1) - Compliance Assurance Monitoring (CAM)** - If the number of exceedances or excursions exceeds 5 percent duration of the operating time for the three press parts washing machines for a semiannual reporting period, the permittee shall develop, implement and maintain a Quality Improvement Plan (QIP) in accordance with 40 CFR 64.8. If a QIP is required, the permittee shall have it available for inspection. The QIP initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the permittee shall modify the plan to include procedures for conducting one or more of the following, as appropriate:
- a. Improved preventative maintenance practices;
  - b. Process operation changes;
  - c. Appropriate improvements to control methods;
  - d. Other steps appropriate to correct control performance; and
  - e. More frequent or improved monitoring.
- (9 VAC 5-80-110 E (Article 1) and 40 CFR 64.8(a) and (b))

53. **Process Equipment Requirements – (emission unit ID#s 32-1 and 32-2) – Monitoring and Recordkeeping** - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Piedmont Regional Office. These records shall include, but are not limited to:
- a. The annual emissions from the press parts washing machines (emission unit ID# 32-1) and the manual wash tank (emission unit ID# 32-2), calculated as the sum of each consecutive 12 month period. Records shall be kept for the press parts washing machines and individual records for the manual wash tank (emission unit ID# 32) to show compliance with conditions 40, 42 and 43. The emissions may be calculated by use of a mass balance or other method as directed or approved by the DEQ.
  - b. A mass balance supporting an emission estimate shall include: amount consumed in the process (records indicating amount of replacement solvent, or solution, will be acceptable measure of material consumed); amount of material disposed; and other records as required of any other manner in which VOC exits the process.
  - c. Records shall be kept demonstrating the VOC content and HAP content of each solvent, or solution, used in the metal cleaning operation. Acceptable records to demonstrate VOC content shall be the use of current material safety data sheets (MSDS) or current certified product data sheets (CPDS) provided the information contained therein is determined using approved EPA test methods (e.g. 40 CFR part 60 appendix A – EPA Method 24). Current Material Safety Data Sheets (MSDS) shall be kept on site for each type of solvent or solution used in the metal cleaning operation – including the VOC content of each.
  - d. The hourly emissions from the press parts washing machines. Hourly emissions may be calculated with an emission factor based on a six-month averaging period. The records supporting the emission factor shall include the emissions and the number of batches for the averaging period.
  - e. Records shall be kept demonstrating compliance or non-compliance with “Emission standards for solvent metal cleaning operations using non-halogenated solvents (Rule 4-24)”.
  - f. Records shall be kept of the number of cycles/hr each press parts washing machine operated at and what % VOC cleaning solutions were used for each cycle.
  - g. Records (i.e. material safety data sheets (MSDS) and/or certified product data sheets (CPDS)) shall be kept of the materials/solutions used to clean the filter wash tank and the glue wash tank.

h. Records as required in condition 45.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-50-50, 9 VAC 5-80-110 and Condition 12 of 5/30/01 Permit)

54. **Process Equipment Requirements – (emission unit ID# 32-1) – Compliance Assurance Monitoring (CAM) Recordkeeping** – The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan (QIP) required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan (QIP), and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

(9 VAC 5-80-110 E and 40 CFR 64.9(b))

55. **Process Equipment Requirements – (emission unit ID# 32-1) - Compliance Assurance Monitoring (CAM) Reporting** - The permittee shall submit CAM reports as part of the Title V semi-annual monitoring reports required by Condition 94 of this permit to the Director, Piedmont Regional Office. Such reports shall include at a minimum:

- a. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- b. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- c. A description of the actions taken to implement a quality improvement plan (QIP) during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

(9 VAC 5-80-110 F and 40 CFR 64.9(a))

**MACT Conditions (MACT KK – National Emission Standards for the Printing and Publishing Industry) – (emission unit ID#s 21-1, 21-2, 21-3, 21-4, 21-5, 21-6, 21-7, 21-8, 21-9, 21-10, 21-11, 21-12, 23, 24, 29 and 30)**

56. **Process Equipment Requirements – (emission unit ID#s 21-1, 21-2, 21-3, 21-4, 21-5, 21-6, 21-7, 21-8, 21-9, 21-10, 21-11, 21-12, 23, 24, 29 and 30) – Limitations/Standards** - Each product and packaging rotogravure printing affected source shall limit organic HAP emissions to no more than 5 percent of the organic HAP applied for the month; or to no more than 4 percent of the mass of inks, coatings, varnishes, adhesives, primers, solvent, reducers, thinners, and other materials applied for the month; or to no more than 20 percent of the mass of the solids applied for the month; or to a calculated equivalent allowable mass based on the organic HAP and solids contents of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month. The owner or operator of each product and packaging rotogravure or wide-web flexographic printing affected source shall demonstrate compliance with this standard by following one of the procedures in paragraphs 40 CFR 63.825 (b)(1) – (b)10.  
(9 VAC 5-80-110 and 40 CFR 63.825(b))
57. **Process Equipment Requirements – (emission unit ID#21-1, 21-2, 21-3, 21-4, 21-5, 21-6, 21-7, 21-8, 21-9, 21-10, 21-11, 21-12, 23, 24, 29 and 30) – Performance Test Methods** - The owner or operator may use formulation data to determine the weight fraction organic HAP of a material. Formulation data may be provided to the owner or operator on a consumer product data sheet (CPDS) by the supplier of the material or an independent third party. Formulation data may be used provided that the weight fraction organic HAP is calculated according to the criteria and procedures in 40 CFR 63.827(b)(2)(iii)(A) through (D). In the event of an inconsistency between the formulation data and the result of Method 311 of appendix A of 40 CFR 63, where the test result is higher, the Method 311 data will take precedence unless, after consultation, the owner or operator can demonstrate to the satisfaction of the enforcement agency (Virginia Department of Environmental Quality (VADEQ) – Piedmont Regional Office (PRO)) that the formulation data are correct.  
(9 VAC 5-80-110 and 40 CFR 63.827(b)(2)(iii))
58. **Process Equipment Requirements – (emission unit ID# 21-1, 21-2, 21-3, 21-4, 21-5, 21-6, 21-7, 21-8, 21-9, 21-10, 21-11, 21-12, 23, 24, 29 and 30) - Recordkeeping** - The recordkeeping provisions of 40 CFR 63 Subpart A that apply and those that do not apply to owners and operators of affected sources subject to 40 CFR 63 Subpart KK are listed in Table 1 of 40 CFR 63 Subpart KK.  
(9 VAC 5-80-110 and 40 CFR 63.829(a))

59. **Process Equipment Requirements – (emission unit ID# 21-1, 21-2, 21-3, 21-4, 21-5, 21-6, 21-7, 21-8, 21-9, 21-10, 21-11, 21-12, 23, 24, 29 and 30) – Recordkeeping/Monitoring** – Records specified in 40 CFR 63.10(b)(2), of all measurements needed to demonstrate compliance with this standard, such as continuous emission monitor data, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report.  
(9 VAC 5-80-110 and 40 CFR 63.829(b)(1))
60. **Process Equipment Requirements – (emission unit ID# 21-1, 21-2, 21-3, 21-4, 21-5, 21-6, 21-7, 21-8, 21-9, 21-10, 21-11, 21-12, 23, 24, 29 and 30) - Reporting** – The reporting provisions of 40 CFR 63 Subpart A that apply and those that do not apply to owners and operators of affected sources subject to 40 CFR 63 Subpart KK are listed in Table 1 of 40 CFR 63 Subpart KK.  
(9 VAC 5-80-110 and 40 CFR 63.830(a))

**Emission Standards for Volatile Organic Compound Storage and Transfer Operations (Rule 4-25) – (emission unit ID#s I01 and I14, I02 – I13, I15 and I16, and I18)**

61. **Process Equipment Requirements – (emission unit ID#s I01 and I14, I02 – I13, I15 and I16 and I18) - Limitations** - Storage Tank I.D. #s I01 and I14, I02 – I13, I15 and I16 and I18 shall be equipped with a control method that will remove, destroy or prevent the discharge into the atmosphere of at least 60% by weight of volatile organic compound emissions during the filling of such tank. The 60% reduction by weight shall be achieved by filling of Storage Tank ID. #s. I01 and I14, I02 – I13, I15 and I16 and I18 through the use of a vapor control system such as a submerged fill pipe.  
(9 VAC 5-80-110 and 9 VAC 5-40-3430 A.1.)

**RACT Order DSE-413A-86 Requirements – (emission unit ID#s 21-1, 21-2, 21-3, 21-4, 21-5, 21-6, 21-7, 21-8, 21-9, 21-10, 21-11, 21-12 and 24)**

62. **Process Equipment Requirements – (emission unit ID#s 21-1, 21-2, 21-3, 21-4, 21-5, 21-6, 21-7, 21-8, 21-9, 21-10, 21-11 and 21-12) - Limitations** – Volatile organic compound emissions from the affected facilities at the Plant\* shall be controlled and reduced as outlined in this Order.  
(9 VAC 5-80-110 and Condition 2 of Section E of RACT Order DSE-413-A86)

63. **Process Equipment Requirements – (emission unit ID#21-1, 21-2, 21-3, 21-4, 21-5, 21-6, 21-7, 21-8, 21-9, 21-10, 21-11 and 21-12) - Limitations** - The “Group A Facilities” at the Plant\* are: Presses Number 1, 2, 4, 6, 8, 9, 10 and 11 (emission unit ID#s 21-1, 21-2, 21-4, 21-5, 21-6, 21-7, 21-8, 21-9). Extruders Number 1, 2, 3, 4, (emission unit ID#s 21-10, 21-11, 21-12) (extruder no. 4 is no longer on site) and the treating station for Press No. 3 (emission unit ID# 21-3).  
(9 VAC 5-80-110 and Condition 3 of Section E of RACT Order DSE-413A-86)
64. **Process Equipment Requirements – (emission unit ID#21-1, 21-2, 21-3, 21-4, 21-5, 21-6, 21-7, 21-8, 21-9, 21-10, 21-11 and 21-12) - Limitations** - The reduction in volatile organic compound emissions from the Group A facilities at the Plant\* shall not be less than sixty-five (65) percent, by weight on a daily basis over the historical amount of solvent used to apply the same amount of solids. Across line averaging of emission reductions will be utilized to determine compliance with the specified daily emission reduction requirement.  
(9 VAC 5-80-110 and Condition 4 of Section E of RACT Order DSE-413A-86)
65. **Process Equipment Requirements – (emission unit ID#21-1, 21-2, 21-3, 21-4, 21-5, 21-6, 21-7, 21-8, 21-9, 21-10, 21-11 and 21-12) - Limitations** – Compliance with the requirements of condition 3 and 4 (*condition 63 and 64 of this permit*) for the Group A facilities will be determined by the use of a “Daily VOC Model”. The model will calculate daily emission reductions by comparing actual material usings to the historical amount of solvent bearing material used. The model will calculate daily emissions by measuring, on a job basis, all VOC bearing materials consumed. Total job VOC usings shall be apportioned to individual days based on production records. The daily historical amount of solvent which would have been used shall be calculated by factors relating the daily amount of applied solids and the historical amount of solvent required to apply a pound of solids. The historical factors and compliance calculations are shown in Attachment A (of RACT DSE-413A-86).  
(9 VAC 5-80-110 and Condition 5 of Section E of RACT Order DSE-413A-86)
66. **Process Equipment Requirements – (emission unit ID# 24) - Limitations** – The Board has determined that RACT for No. 3 Laminator is an emission limit of 2.0 tons per day. Attachment B to this Order (DSE-413A-86) outlines the basis for this determination.  
(9 VAC 5-80-110 and Condition 7 of Section E of RACT Order DSE-413A-86)
- \* “Plant” refers to Reynolds Consumer Products Inc. (– Bellwood Printing Plant) in Chesterfield County.
67. **Process Equipment Requirements – (emission unit ID# 21-1, 21-2, 21-3, 21-4, 21-5, 21-6, 21-7, 21-8, 21-9, 21-10, 21-11 and 21-12) – Recordkeeping and Reporting** – Records consisting of information as to the calculated daily reduction in emissions of volatile organic compounds from the affected facilities, except those emissions treated by add-on control equipment at the Plant, shall be kept available at the plant

for at least a two year time period\*\*. Reynolds shall provide the Board an exception report at the end of any quarter when the conditions of Section E, Conditions 2, 3 and 4 (*Conditions 62, 63 and 64 of this permit*) of this Order (DSE-413A-86) are not met.

\*\* : For the purposes of Title V compliance, records required by Condition 6 (*condition 67 of this permit*) of Section E of RACT Order DSE-413A-86 shall be kept available at the Bellwood Printing Plant (*Reynolds Consumer Products Inc.*) for at least a five year time period.

(9 VAC 5-80-110 and Condition 6 of Section E of RACT Order DSE-413A-86)

68. **Process Equipment Requirements – (emission unit ID# 21-3) - Compliance Assurance Monitoring (CAM)** - The permittee shall monitor, operate, calibrate and maintain the thermal oxidizer controlling press no. 3 (emission unit ID# 21-3) according to the following:

<b>Monitoring, Frequency, Records</b>	<b>Performance Criteria</b>	<b>Indicator Range; Averaging Period</b>
The thermal oxidizer’s combustion chamber temperature shall be recorded continuously on a circular paper chart.  Records of date and time of interlock shutdowns are maintained.	Thermal oxidizer combustion chamber temperature measured by a temperature sensor/thermocouple.	During operation of press 3, combustion chamber temperature shall be maintained at a minimum of 1400°F.  The set point for the interlock shall be set at 1405°F. Temperatures below 1400°F (while the press is running “solvent based material*”) shall be considered deviations.

\*: “Solvent Based Material” - inks/coatings which do not meet the definition of high solids, low VOC or waterborne as defined under 9 VAC 5 Chapter 40, Part II, Article 36.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.6 (c))

69. **Process Equipment Requirements – (emission unit ID# 21-3) - Compliance Assurance Monitoring (CAM)** - The permittee shall conduct the monitoring and fulfill the other obligations specified in 40 CFR 64.7 through 40 CFR 64.9.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.6 (c))

70. **Process Equipment Requirements – (emission unit ID# 21-3) - Compliance Assurance Monitoring (CAM)** - At all times, the permittee shall maintain the monitoring equipment, including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7 (b))

71. **Process Equipment Requirements – (emission unit ID# 21-3) - Compliance Assurance Monitoring (CAM)** - Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that press 3 (emission unit ID# 21-3) is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of compliance assurance monitoring, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by inadequate maintenance or improper operation are not malfunctions.
- (9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7 (c))
72. **Process Equipment Requirements – (emission unit ID# 21-3) - Compliance Assurance Monitoring (CAM)** - Upon detecting an excursion or exceedance, the permittee shall restore operation of the press 3 (emission unit ID# 21-3) (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup and shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator, designated condition, or below the applicable emission limitation or standard, as applicable.
- (9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7 (d)(1))
73. **Process Equipment Requirements – (emission unit ID# 21-3) - Compliance Assurance Monitoring (CAM)** - Determination that acceptable procedures were used in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
- (9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7(d)(2))
74. **Process Equipment Requirements – (emission unit ID# 21-3) - Compliance Assurance Monitoring (CAM)** - If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved

monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Director, Piedmont Regional Office and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.7(e))

75. **Process Equipment Requirements – (emission unit ID# 21-3) - Compliance Assurance Monitoring (CAM)** - If the number of exceedances or excursions exceeds 5 percent duration of the operating time for press 3 for a semiannual reporting period, the permittee shall develop, implement and maintain a Quality Improvement Plan (QIP) in accordance with 40 CFR 64.8. If a QIP is required, the permittee shall have it available for inspection. The QIP initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the permittee shall modify the plan to include procedures for conducting one or more of the following, as appropriate:

- a. Improved preventative maintenance practices;
- b. Process operation changes;
- c. Appropriate improvements to control methods;
- d. Other steps appropriate to correct control performance; and
- e. More frequent or improved monitoring.

(9 VAC 5-80-110 E (Article 1) and 40 CFR 64.8(a) and (b))

76. **Process Equipment Requirements – (emission unit ID# 21-3) – Compliance Assurance Monitoring (CAM) Recordkeeping** – The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan (QIP) required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan (QIP), and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

(9 VAC 5-80-110 E and 40 CFR 64.9(b))

77. **Process Equipment Requirements – (emission unit ID# 21-3) - Compliance Assurance Monitoring (CAM) Reporting** - The permittee shall submit CAM reports as part of the Title V semi-annual monitoring reports required by Condition 94 of this permit to the Director, Piedmont Regional Office. Such reports shall include at a minimum:
- a. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
  - b. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
  - c. A description of the actions taken to implement a quality improvement plan (QIP) during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.
- (9 VAC 5-80-110 F and 40 CFR 64.9(a))

**RACT Order DSE-414A-86 Requirements – (emission unit ID#s 21-1, 21-2, 21-3, 21-4, 21-5, 21-6, 21-7, 21-8, 21-9, 21-10, 21-11, 21-12 and 24)**

78. **Process Equipment Requirements – (emission unit ID#s 21-1, 21-2, 21-3, 21-4, 21-5, 21-6, 21-7, 21-8, 21-9, 21-10, 21-11, 21-12 and 24) - Limitations** – In SIP Order DSE-413A-86, Section E, Conditions 2, 3, and 4 (*conditions 62, 63 and 64 of this permit*), the facilities are designated and the RACT emission limits are specified. Reynolds agrees to meet, or as appropriate continue to meet, the requirements set in DSE-413A-86 for the specified equipment beginning on December 31, 1987.
- (9 VAC 5-80-110 and Condition 2 of Section E of RACT Order DSE-414A-86)
79. **Process Equipment Requirements – (emission unit ID#s 21-1, 21-2, 21-3, 21-4, 21-5, 21-6, 21-7, 21-8, 21-9, 21-10, 21-11 and 21-12) - Limitations** – In SIP Order DSE-413A-86 for the Bellwood Plant, Section E, Condition 5 (*condition 64 of this permit*), the Daily VOC Model is described. Reynolds agrees to implement this model on December 31, 1987.
- (9 VAC 5-80-110 and Condition 3 of Section E of RACT Order DSE-414A-86)

## Facility Wide Conditions

80. **Facility Wide Conditions - Limitations** - Unless otherwise specified in this part, no owner or other person shall cause or permit to be discharged into the atmosphere from any affected facility any visible emissions which exhibit greater than 20% opacity, except for one six-minute period in any one hour of not more than 60% opacity. Failure to meet the requirements of this section because of the presence of water vapor shall not be a violation of this section. This standard is applicable to the following emission unit ID#s: 21-1, 21-2, 21-3, 21-4, 21-5, 21-6, 21-7, 21-8, 21-9, 21-10, 21-11, 21-12 and 24.  
 (9 VAC 5-80-110, and 9 VAC 5-50-80)
81. **Facility Wide Conditions - Testing** - The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.  
 (9 VAC 5-40-30 or 9 VAC 5-50-30 and 9 VAC 5-80-110)
82. **Facility Wide Conditions - Testing** - If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ.  
 (9 VAC 5-80-110)

## Insignificant Emission Units

83. **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 (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
I01	Hot air heater (washroom)	9 VAC 5-80-720 C		1.2 MMBtu/hr to 2.5 MMBTU/HR
I02	Hot oil heater (washroom)	9 VAC 5-80-720 C		0.9 MMBtu/hr
I03	Oil/lubricant dispensing & used oil in maintenance area	9 VAC 5-80-720 B	VOC	Approx. 600 gal and less.
I04	Trim handling system for bailers, cutters and extruders	9 VAC 5-80-720 B	PM	

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
I05	Water wash tank (washroom)	9 VAC 5-80-720 A	VOC	
I06	Oil-water separator	9 VAC 5-80-720 B	VOC	
I08	Aboveground Storage Tank AST 17 125,000 gallon tank #6 fuel oil	9 VAC 5-80-720 B	VOC	
I09	Core Cutting	9 VAC 5-80-720 B	PM	
I10	Pellet Conveying System	9 VAC 5-80-720 B	PM	
I11	Rubber Roll Grinder	9 VAC 5-80-720 B	PM	
I12	Wax Heaters	9 VAC 5-80-720 B	VOC	Approx. 40 gallons
I13	Vacuum Cleaning System	9 VAC 5-80-720 B	PM	
I14	Blown Film Extruder	9 VAC 5-80-720 B	VOC	40 lbs/hr
I18	Slitters	9 VAC 5-80-720 B	PM	
I19	Gluers	9 VAC 5-80-720 B	VOC	
I20	Carton Cutter Creasers	9 VAC 5-80-720 B	PM	
I21	Washroom Solvent Recovery System	9 VAC 5-80-720 B	VOC	
I22	Cooling Towers	9 VAC 5-80-720 A	PM	
I23	Spoolers	9 VAC 5-80-720 B	PM	600 feet per minute

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.

**Permit Shield & Inapplicable Requirements**

84. **Permit Shield & Inapplicable Requirements** - Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by (i) the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.

(9 VAC 5-80-140)

**General Conditions**

85. **General Conditions - Federal Enforceability** -All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.

(9 VAC 5-80-110 N)

86. **General Conditions - Permit Expiration**- This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

87. **General Conditions - Permit Expiration**-The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.

(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

88. **General Conditions - Permit Expiration**-If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.  
(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)
89. **General Conditions - Permit Expiration**-No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.  
(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)
90. **General Conditions - Permit Expiration**-If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.  
(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)
91. **General Conditions - Permit Expiration**-The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.  
(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)
92. **General Conditions -Recordkeeping and Reporting** - All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
- a. The date, place as defined in the permit, and time of sampling or measurements.
  - b. The date(s) analyses were performed.
  - c. The company or entity that performed the analyses.
  - d. The analytical techniques or methods used.
  - e. The results of such analyses.

f. The operating conditions existing at the time of sampling or measurement.

(9 VAC 5-80-110 F)

93. **General Conditions -Recordkeeping and Reporting** - Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(9 VAC 5-80-110 F)

94. **General Conditions -Recordkeeping and Reporting** - The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.

b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:

(1) Exceedance of emissions limitations or operational restrictions;

(2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or Compliance Assurance Monitoring (CAM) which indicates an exceedance of emission limitations or operational restrictions; or,

(3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that “no deviations from permit requirements occurred during this semi-annual reporting period.”

(9 VAC 5-80-110 F)

95. **General Conditions - Annual Compliance Certification** - Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices for the period ending December 31. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. The permittee shall

maintain a copy of the certification for five (5) years after submittal of the certification. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- a. The time period included in the certification. The time period to be addressed is January 1 to December 31.
- b. The identification of each term or condition of the permit that is the basis of the certification.
- c. The compliance status.
- d. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
- e. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
- f. Such other facts as the permit may require to determine the compliance status of the source.
- g. One copy of the annual compliance certification shall be submitted to EPA in electronic format only. The certification document should be sent to the following electronic mailing address:

[R3\\_APD\\_Permits@epa.gov](mailto:R3_APD_Permits@epa.gov)

(9 VAC 5-80-110 K.5)

96. **General Conditions - Permit Deviation Reporting** - The permittee shall notify the Director, Piedmont Regional Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to Condition 94 of this permit.  
(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)
97. **General Conditions - Failure/Malfunction Reporting** - In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Piedmont Regional Office by facsimile

transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Piedmont Regional Office.

(9 VAC 5-20-180 C)

98. **General Conditions - Severability** - The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.

(9 VAC 5-80-110 G.1)

99. **General Conditions - Duty to Comply** - The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is ground for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.

(9 VAC 5-80-110 G.2)

100. **General Conditions - Need to Halt or Reduce Activity not a Defense** - It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(9 VAC 5-80-110 G.3)

101. **General Conditions - Permit Modification** - A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1605, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.

(9 VAC 5-80-190 and 9 VAC 5-80-260)

102. **General Conditions - Property Rights** - The permit does not convey any property rights of any sort, or any exclusive privilege.

(9 VAC 5-80-110 G.5)

103. **General Conditions - Duty to Submit Information** - The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the

permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.

(9 VAC 5-80-110 G.6)

104. **General Conditions - Duty to Submit Information** - Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.

(9 VAC 5-80-110 K.1)

105. **General Conditions - Duty to Pay Permit Fees** - The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.

(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

106. **General Conditions - Fugitive Dust Emission Standards** - During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
- b. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;
- d. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
- e. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-40-90 and 9 VAC 5-50-90)

107. **General Conditions - Startup, Shutdown, and Malfunction** - At all times, including periods of startup, shutdown, and 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. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.  
(9 VAC 5-50-20 E and 9 VAC 5-40-20 E)
108. **General Conditions - Alternative Operating Scenarios** - Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.  
(9 VAC 5-80-110 J)
109. **General Conditions - Inspection and Entry Requirements** - The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:
- a. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
  - b. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
  - d. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
- (9 VAC 5-80-110 K.2)
110. **General Conditions - Reopening For Cause** - The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and

conditions has been extended pursuant to 9 VAC 5-80-80 F. The conditions for reopening a permit are as follows:

- a. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- b. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- c. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

111. **General Conditions - Permit Availability** - Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

112. **General Conditions - Transfer of Permits** - No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.

(9 VAC 5-80-160)

113. **General Conditions - Transfer of Permits** - In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.

(9 VAC 5-80-160)

114. **General Conditions - Transfer of Permits** - In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.

(9 VAC 5-80-160)

115. **General Conditions - Malfunction as an Affirmative Defense** - A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of condition 121 of this condition are met.  
(9 VAC 5-80-250)
116. **General Conditions - Malfunction as an Affirmative Defense** - The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:
- a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
  - b. The permitted facility was at the time being properly operated.
  - c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
  - d. The permittee notified the Board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F.2.b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.  
(9 VAC 5-80-250)
117. **General Conditions - Malfunction as an Affirmative Defense** - In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.  
(9 VAC 5-80-250)
118. **General Conditions - Malfunction as an Affirmative Defense** - The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.  
(9 VAC 5-80-250)
119. **General Conditions - Permit Revocation or Termination for Cause** - A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or

if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any grounds for revocation or termination or for any other violations of these regulations.

(9 VAC 5-80-190 C and 9 VAC 5-80-260)

120. **General Conditions - Duty to Supplement or Correct Application** - Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.

(9 VAC 5-80-80 E)

121. **General Conditions - Stratospheric Ozone Protection** - If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.

(40 CFR Part 82, Subparts A-F)

122. **General Conditions - Emissions Trading** - Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

- a. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
- b. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
- c. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)

**State-Only Enforceable Requirements**

123. **State-Only Enforceable Requirements** - The following terms and conditions are not required under the federal Clean Air Act or under any of its applicable federal requirements, and are not subject to the requirements of 9 VAC 5-80-290 concerning review of proposed permits by EPA and draft permits by affected states.

Odor .....

State toxics rule .....

(9 VAC 5-80-110 N and 9 VAC 5-80-300)