

**COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Piedmont Regional Office**

STATEMENT OF LEGAL AND FACTUAL BASIS

Reynolds Consumer Products Inc.
2001 Reymet Road, Richmond (Chesterfield County), Virginia
Permit No. PRO50260

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Reynolds Consumer Products Inc. has applied for a Title V Operating Permit for its Reynolds Consumer Products Inc Chesterfield County facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date:
Sherry L. Tostenson
(804) 527-5097

Air Permit Manager: _____ Date:
James E. Kyle, P.E.

Deputy Regional Director: _____ Date:
Kyle Ivar Winter, P.E.

FACILITY INFORMATION

Permittee

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

Facility

Reynolds Consumer Products Inc.
2001 Reymet Road
Richmond (Chesterfield County), Virginia 23237-3798

County-Plant Identification Number: 51-041-00058

SOURCE DESCRIPTION

NAICS Code: 323111 – This industry is primarily engaged in commercial printing (except screen printing, books printing) without publishing (except grey goods printing). Printing processes used in this industry include lithographic, gravure, flexographic, letterpress, engraving, and various digital printing technologies.

NAICS Code 322212 - This industry is primarily engaged in converting paperboard (except corrugated) into folding paperboard boxes without manufacturing paper and paperboard.

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 to 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.

The facility is a Title V major source of Volatile Organic Compounds (VOCs) and Diethylene glycol monoethyl ether (HAP). This source is located in an attainment area for all pollutants; however, the source is located in the Richmond VOC & NO_x emissions control area for VOCs & NO_x. The source is a grandfathered PSD source. The facility is currently permitted under three Minor NSR Permits, issued on October 29, 1998, May 30, 2001, and May 15, 2002. In addition, two Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Consent Orders were issued to this facility (DSE-413-A-86) (Amended 10/86) and (DSE-414-A-86) which addresses emission units 21-1 through 21-12 and emission unit 24.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit on April 16, 2012, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
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)
Process Equipment							
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	–	–	–	

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
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)
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 Oxidizder with a permanent total enclosure	CD003	VOC	May 15, 2002
31	014	(12) Upright Faustel/Diamond Metal Edgers for film, foil and paper (pre-1975)	210 units/min (estimated)	–	–	–	–

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
31	014	Ink Room Mixing	–	–	–	–	–
		Miscellaneous Clean & Lube	–				
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)				

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
118	014	(1) Aboveground Solvent Storage Tank	10,000 gallons	Each listed tank has a submerged fill pipe.	-	VOC	-

EMISSIONS INVENTORY

The 2011 annual emissions (as reported in Virginia’s Comprehensive Environmental Data System (CEDS)) are summarized in the following tables.

2011 Actual Emissions

2011 Criteria Pollutant Emission in Tons/Year				
VOC	CO	SO ₂	PM ₁₀	NO _x
105.52	3.4	0.024	0.31	4.02

2011 Facility Hazardous Air Pollutant Emissions

Pollutant	2011 Hazardous Air Pollutant Emission in Tons/Yr
Ammonia	5.2
Ethylene Glycol	0.3
Toluene	2.6

EMISSION UNIT APPLICABLE REQUIREMENTS

Limitations

State BACT requirements – [emission unit IDs: 23, 32-1, 29, and 30]

The following **VOC control requirements and control related requirements** (as summarized) are State BACT requirements from condition 3 of the Minor NSR permit issued on October 29, 1998, condition 3 of the Minor NSR permit issued on May 30, 2001, and conditions 3, 4, 5, and 10 of the Minor NSR permit issued on May 15, 2002 (respectively).

- Condition 3 of the October 29, 1998 permit addressed requiring the use of compliant inks* and limiting the VOCs as applied.
 *: As defined in the State’s Emission Standards (Rule 4-36) for Flexographic, Packaging Rotogravure, and Publication Rotogravure Printing Lines per section 9 VAC 5-40-5070.
- Condition 3 of the May 30, 2001 permit addressed requiring the use of a condenser recovery system equipped with a temperature gauge for the parts washing machines.
- Condition 3 of the May 15, 2002 permit addressed the following emissions from Laminator #2:
 When using non-compliant inks and coating it was required to use a thermal oxidizer with a 100% capture efficiency or when using compliant inks and coatings they must meet the criteria of the State Regulations as per Rule 4-36.

- Condition 4 of the May 15, 2002 permit - When using compliant inks and coatings is permitted to exhaust to the atmosphere; however, the use of the compliant inks and coatings are determined on an as applied basis – not averaging VOC content across stations as indicated/allowed in the source specific RACTs.
- Condition 5 of the May 15, 2002 permit - Gives the operating conditions for the control equipment of minimum combustion zone temp, minimum retention time, and requiring a device to measure the temperature continuously.
- (Condition 6 of May 15, 2002 permit:
Gives requirements for total enclosure of which is required for control of 100% capture; however, this was not noted as BACT.)
- Condition 10 of the May 15, 2002 permit - Required testing to determine if compliant inks are being utilized.

The following **emission limitations for VOCs** (as summarized) - [*emission unit IDs: 23, 32-1, 32-2, 29, and 30*] – are State BACT requirements from condition 5 of the Minor NSR permit issued on October 29, 1998, condition 10 and 11 of the Minor NSR permit issued on May 30, 2001, and condition 9 of the Minor NSR permit issued on May 15, 2002.

Condition 5 of October 29, 1998 permit:

- Printing press 7: 507.5 lbs/hr 12,180.0 lbs/day 96.0 tons/yr

Conditions 10 and 11 of May 30, 2001 permit:

- Three washing machines: 15.7 lbs/hr 53 tons/yr
- Manual wash tank: 4.6 lbs/hr 20 tons/yr

Condition 9 of May 15, 2002 permit:

- Laminator #2: 57.5 lbs/hr 1,380 lbs/day 29.6 tons/yr

Visible Emission Limitation in underlying NSR permits:

Condition 6 of the Minor NSR permit issued on October 29, 1998 - [*emission unit ID#: 23*] required a 20 percent opacity limit for printing press no. 7 as determined by an EPA Method 9. This condition was based on the State's opacity standard of 20% for new and modified sources. The opacity condition helps to ensure the facility remains in compliance with the ambient air quality standards and for any possible exceedance of limitations.

Operating Limitations (includes process limitations):

The following are **process limitations** (as summarized) [emission unit ID#s: 23, 32-1, 29, and 30] from condition 4 of the Minor NSR permit issued on October 29, 1998, condition 9 of the Minor NSR permit issued on May 30, 2001, and condition 7 of the Minor NSR permit issued on May 15, 2002 which ensures the emissions limitations are not exceeded.

- Condition 4 had the following process limitation:
“The VOCs as applied for the operation and cleaning of printing press no. 7 shall be no more than 96.0 tons per year, calculated monthly as the sum of each consecutive 12 month period.”

The remaining section of this condition addresses what is considered/defined as “VOCs as applied”.

- Condition 9 addressed the three parts washing machines and the manual wash tank being limited to using no more than 53 and 20 tons of VOCs per year (respectively) along with a total use limit for the solvent metal cleaning operation of 73 tons per year. All of this was calculated as the sum of each consecutive 12-month period.
- Condition 7 addressed Laminator #2 having a maximum speed limitation of 1,000 feet per minute when using inks and coatings that contain VOCs. There was no speed limitation when using inks and coatings with no VOCs.

The following are ***miscellaneous operating limitations*** - [emission unit ID#s: 32-1, 32-2, 32-3, 29, and 30] from conditions 4, 5, 6, and 7 of the Minor NSR permit issued on May 30, 2001, and condition 8 of the Minor NSR permit issued on May 15, 2002 which ensures the emissions limitations are not exceeded.

- Condition 4 addressed the different hourly operating rate limitations for the three press parts washers based on using a solvent based solution that is greater than 4.5% VOC or less than 4.5% VOC. The lower % VOC solvent solution would allow for more cycles to be run in an hour of 3 cycles/hr vs. 1 cycle/hr for the higher solvent solution but yet not exceed the hourly emission limit.
- Condition 5 required the applicable parts washers to be operated in compliance with the State’s solvent metal cleaning operation regulation (Rule 4-24). According to the rule the parts washers would meet the % of reduction in emissions based on the operating requirements in the Rule.
- Conditions 6 and 7 ensured there would be no use of VOC solutions used in the filter wash tank and the glue wash tank and the use of no HAPs in the press parts washers.
- Condition 8 ensured no dirtier fuels would be burned in the associated burners to heat the dryers and the thermal oxidizers than what the emissions were evaluated upon.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

Article 8: Emission Standards for Fuel Burning Equipment (Rule 4-8) - [emission unit ID#s: 1, 2, and 3]

Limitations/Standards

(9 VAC 5-40-900 Standard for *particulate matter* and 9 VAC 5-40-930 Standard for *sulfur dioxide*)

Condition 1 of the Title V permit addressed both the particulate matter (PM) and the sulfur dioxide standards. The PM and sulfur dioxide allowable emissions (lbs PM/MMBtu (input) & lbs of sulfur dioxide (lbs/hr)) were both based on the total heat capacity (MMBtu/hr) of all units.

(9 VAC 5-40-940 Standard for *visible emissions*)

Condition 2 of the Title V permit addressed the Standard for visible emissions which was verbatim.

Monitoring/Recordkeeping

Conditions 3, 4, 5, 6, and 7 of the Title V permit addressed monitoring and recordkeeping requirements to meet Part 70 requirements. Condition 3 addressed monitoring/recordkeeping for exceedances of the opacity standard in condition 2 along with increased frequency when combusting dirtier liquid fuels. Conditions 4, 5, 6 and 7 addressed monitoring and recordkeeping of all liquid fuels burned in each of the boilers along with verifying the heat and sulfur content of each liquid fuel by fuel purchase order and fuel certification. This information is then inserted into each of the respective equations to demonstrate compliance with the standards.

Article 24: Emission Standards for Solvent Metal Cleaning Operations Using Non-Halogenated Solvents (Rule 4-24)* - [Emission unit ID#s: 32-1 and 32-2]

Condition 37 of the Title V permit (condition 5 of the May 30, 2001 permit) addressed this Rule by all applicable solvent metal cleaning operations shall operate in compliance of this regulation.

*: This standard includes a VOC standard for the different types of operations which requires different levels of VOC emissions reductions by the stated control technology guidelines. These control technology guidelines can include such things as good operating practices.

Article 25: Emission Standards for Volatile Organic Compound Storage and Transfer Operations (Rule 4-25)

(As previously indicated in the prior Statement of Basis for this facility all of the aboveground storage tanks (I01 & I14, I02-I13, I15 & I16, and I18) are all constructed with submerged fill pipes as all of the listed tanks possibly could store material which has a vapor pressure >1.5 pounds per square inch absolute (PSIA) under actual storage conditions or, in the case of filling under actual filling conditions. This satisfies the control technology guidelines of at least 60% by weight of VOCs when filling the aboveground storage tanks by the use of a vapor control system such as a submerged fill pipe. No monitoring and recordkeeping will be needed to ensure this standard is being met as these requirements shall be physically in place and shall not be removed; if so, this will be noted in the semi-annual compliance certification.)

Article 36: Emission Standards for Flexographic, Packaging Rotogravure, and Publication Rotogravure Printing Lines (Rule 4-36):

This is a packaging rotogravure printing facility located in the Richmond VOC emissions control area which has a potential to emit/actual VOC emissions greater than 100 tons per year which makes this facility subject to this Rule. The new units not included in the two listed RACTs for this facility are subject to the requirements in this rule at minimum such as the standard for volatile organic compounds and the required daily (24 hour average) line by line recordkeeping for Article 36. This recordkeeping establishes compliance with the VOC standard of whether compliant inks based on a weighted average used on a single line are meeting the definition of such. Compliance with the VOC standard for when non-compliant inks are used is whether they are being controlled to the minimum control requirement of 65% over the 24 hour compliance averaging period. The new units are subject to State BACT* in the associated permits but include the VOC Standards defining compliant inks and the use of non-

compliant inks for AQP-4 recordkeeping as indicated in this Rule.

*: BACT – Best Available Control Technology – this can more stringent

The following visible emission limitation/standard from the Virginia Administrative Code was not included in the May 30, 2001 and the May 15, 2002 NSR minor permits; however, it was included in the initial Title V permit and the renewal issued in 2007.

9 VAC 5-50-80, New Source Standard for Visible Emissions.

Source Specific RACTs (DSE-413A – 86) and (DSE-414A-86) (These RACTs are being addressed here as the previously listed emission standards (existing rules) are Reasonably Available Control Technology (RACT) standards for categories of emissions sources).

Additionally, the two source specific RACTs (DSE-413A – 86) and (DSE-414A-86) for Reynolds addressed 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 2-12 which is the Group A facilities along with Laminator #3 (emission unit ID#: 24). The RACTs as summarized required a limitation of a 65% reduction by weight on a daily basis at minimum for the Group A facilities and the limitation for Laminator #3 required a 2.0 tons of VOCs/day to protect the daily ozone standard. The group A facilities “Daily VOC Model” is what is used for monitoring; however, emission unit ID #: 21-3 required a CAM plan for the associated thermal oxidizer and capture system. These source specific RACTs went through the public participation process which included EPA’s review. Therefore; no additional monitoring requirements were specified except for CAM.

Monitoring/Recordkeeping

The Title V permit includes requirements for maintaining records of all monitoring and testing required by the permit. These include the following:

The recordkeeping for the **October 29, 1998 permit for printing press 7 (emission unit ID # 23)** included primarily VOC recordkeeping to ensure compliant inks were being used (as defined in the State’s Article 36 as discussed prior) and not high solvent inks (non-compliant inks) which would need to be controlled. Additional VOC recordkeeping included a monthly material balance based on Article 36’s line by line daily recordkeeping (AQP-4) along with emissions for the previous twelve months. These recordkeeping/monitoring requirements ensure the VOCs as applied limits and the emission limits are not exceeded.

The recordkeeping for the **May 30, 2001 permit for three parts washing machines (emission unit ID # 32-1), manual wash tank (emission unit ID # 32-2), filter wash tank and glue tank (emission unit ID # 32-3)** included individual emissions on a 12 month consecutive basis for the press parts washing machines and the manual wash tank, mass balance (based on amount of replacement solvent and material disposed and the like), VOC and HAP content of each solvent or solution based on information from MSDS and CPDS sheets which used EPA Method 24 for VOCs, hourly emissions based on a 6 month averaging period which entails an emission factor based on the emissions and number of batches,

The recordkeeping for the **May 15, 2002 permit for laminator #2 (emission unit ID #s 29 & 30)** again included primarily VOC recordkeeping which included the AQP-4 recordkeeping requirements for Rule 4-36 and records ensuring compliant inks were used. These same types

of requirements basically are the same as what was in the 1998 NSR permit. Additional type of records included continuous records of the thermal oxidizer combustion zone temperature to ensure proper operation of the control equipment/destruction of the VOCs. The remaining records were primarily to ensure good operation and maintenance of the control equipment such as maintenance schedule, spare parts, operating procedures, and operator training.

The monitoring and recordkeeping requirements in the various NSR permit conditions did not need to be modified to meet Part 70 requirements.

In addition, there is no monitoring for the visible emission requirements for the printing units which is consistent with MACT KK of not requiring opacity and visible emissions observations. The same logic was applied to the parts washing machine which is controlled by a condenser recovery system. Operation of the current VOC emitting lines should not result in visible emissions.

Testing

Condition 10 of the May 15, 2002 permit (condition 33 of Title V permit) - Required testing to determine if compliant inks are being utilized. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard. The May 15, 2002 and May 30, 2001 permits included conditions (condition 12 and condition 8 respectively) in the respective permits so that the permitted facility was constructed to allow for testing. These conditions were wrapped into the facility wide condition 82 of this Title V permit. MACT KK does discuss possible testing by EPA Method 311 for HAPs if there is an inconsistency in the formulation data such as a consumer product data (CPDS) sheet of which was included in this Title V permit.

Reporting

There were no reporting requirements in the underlying NSR permits. However, there were reporting requirements associated with the RACT of an exception report during such a quarter, reporting with CAM which is included in the semi-annual Title V compliance report, reporting requirements for MACT KK and any associated reporting for MACT DDDDD.

Maximum Achievable Control Technology (MACT)

MACT DDDDD – National Emission Standard for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters

The boilers (emission unit ID #s: 1, 2, and 3) meet the applicability which includes being located at a major source of HAPs. A general condition was implemented in this Title V permit as it is in a state of flux. This regulation may have some changes possibly in the near future of which a general condition would allow for no changes to have to be made. As a result, at this time EPA issued a letter on February 2, 2012 of “no action assurance (NAA)” regarding certain deadlines of this regulation.

MACT KK – National Emission Standard for the Printing and Publishing Industry

Limitations/Standards: Condition 56 of the Title V permit addresses the organic HAP limitation/standard for product and packaging rotogravure printing of requiring certain HAP percentages in terms of as applied, mass of inks/coatings, thinners and the like, or mass of solids applied or calculated equivalent allowable mass applied. **Monitoring/Recordkeeping:** The recordkeeping of formulation data, material usage and HAP usage as specified in conditions 57 and 59 of this permit monitors whether the facility is in compliance with MACTKK. Also AQP-4 recordkeeping contains the same types of records which include capture/control systems, tracking material usage, and VOCs. The associated CAM plans also tracks the same type of monitoring information. Finally, one of the underlying permits, the May 15, 2002 permit also requires tracking of HAPs in addition to the MACT KK requirements. **Reporting:** Any malfunction reports are rolled into the semi-annual Title V report. The reporting provisions are as according to 40 CFR 63 Subpart A (such as a compliance status report, any performance testing, and a semiannual summary report) **Testing:** MACT KK does discuss possible testing by EPA Method 311 for HAPs if there is an inconsistency in the formulation data such as a consumer product data sheet (CPDS).

Streamlined Requirements

The following conditions in the underlying Minor NSR permits have not been included in the Title V permit along with the rationale:

- **Inspection and entry** condition – the same requirements are included in the Title V general conditions which are as stringent along with it being redundant. The requirements have been overtaken in the Title V (Part 70) regulations. (Correlating conditions in the Minor NSR permits: condition 9 of the October 29, 1998 permit, condition 14 of the May 30, 2001 permit and condition 13 of the May 15, 2002 permit)
- **Malfunction reporting** condition – the same requirements are part of the Title V general conditions. As indicated prior, it would be redundant. (Correlating conditions in the Minor NSR permits: condition 15 of the May 30, 2001 permit and condition 14 of the May 15, 2002 permit)
- **Suspension or revocation** of an NSR permit condition – the condition for suspension or revocation of an NSR permit can be considered extraneous to the Title V permit. This is based on if the NSR permit is revoked or amended through unsolicited action by DEQ the Title V permit will be changed in a separate and independent action from the NSR change. The Title V permit will change to reflect the changes in applicable requirements brought about by the NSR change. (Correlating conditions in the Minor NSR permits: condition 8 of the October 29, 1998 permit, condition 13 of the May 30, 2001 permit, and condition 17 of the May 15, 2002 permit).
- **Transfer of ownership** condition relative to the Title V permit – the transfer requirements are included in the Title V general conditions which make it redundant. (Correlating conditions in the Minor NSR permits: condition 10 of the October 29, 1998 permit, condition 18 of the May 30, 2001 permit, and condition 18 of the May 15, 2002 permit).

In general certain conditions within existing NSR permits may be applicable to all newly constructed or modified equipment that receive a permit such as the condition for maintenance/operating procedures.

In addition, the following conditions:

- “Registration/update” condition - (condition 11 of October 29, 1998 NSR minor permit, condition 19 of May 30, 2001 NSR minor permit and condition 19 of May 15, 2002 minor NSR permit)
- “Permit copy” condition – (condition 12 of October 29, 1998 NSR minor permit, condition 20 of May 30, 2001 NSR minor permit, and condition 20 of May 15, 2002 NSR minor permit)
- “Violation of ambient air quality standard” condition - (condition 15 of May 15, 2002 NSR minor permit)

Will not be included in the Title V permit because they contain no specific requirements, are environmentally insignificant or made redundant.

GENERAL CONDITIONS

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

Comments on General Conditions

Permit Expiration

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

This general condition cite(s) the Article(s) that follow(s):
Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:
9 VAC 5-80-80. Application
9 VAC 5-80-140. Permit Shield
9 VAC 5-80-150. Action on Permit Applications

Failure/Malfunction Reporting

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

Permit Modification

This general condition cites the sections that follow:

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

Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in general condition "Malfunction as an Affirmative Defense" and general condition "Failure/Malfunction Reporting". For further explanation see the comments on general condition "Failure/Malfunction Reporting".

This general condition cites the sections that follow:

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

Asbestos Requirements

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

This general condition contains a citation from the Code of Federal Regulations (CFR) that follow:

- 40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.

40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.

40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.

This general condition cites the regulatory sections that follow:

9 VAC 5-60-70. Designated Emissions Standards

9 VAC 5-80-110. Permit Content

STATE ONLY APPLICABLE REQUIREMENTS

The following Virginia Administrative Codes have specific requirements only enforceable by the State and have been identified as applicable by the applicant:

9 VAC 5 Chapter 40, Part II, Article 2 Emission Standards for Odor (Rule 4-2)

9 VAC 5-40-140 Standard for Odor

In addition, the State Toxics Rules for existing sources and new and modified sources (Rules 6-4 and 6-5) for toxic pollutants are State Only Applicable Requirements but were not identified by the applicant. Also, the Odorous Emissions Rule (Rule 5-2) for new and modified sources was not identified by the applicant; however, is only enforceable by the State.

FUTURE APPLICABLE REQUIREMENTS

No future applicable requirements have been identified for this facility.

INAPPLICABLE REQUIREMENTS

New Source Performance Standards (NSPSs)

NSPS Dc for small industrial-commercial-institutional steam generating units is not applicable to the ≥ 10 mmbtu/hr but < 100 mmbtu/hr boilers (emission unit IDs 1, 2, and 3) as all of these units are grandfathered units which do not meet the applicability date of June 9, 1989 for construction, modification, or reconstruction.

Maximum Achievable Control Technology (MACT) standard

The MACT standard for industrial process cooling towers in 40 CFR 63 **Subpart Q** appears to be currently not applicable. It is the Department's understanding that chromium-based water treatment chemicals are not used in the cooling water.

The MACT standard for halogenated solvent cleaning in 40 CFR 63 **Subpart T** is not currently applicable. The facility does not use any halogenated cleaning solvents in its parts washers.

Greenhouse Gases (GHGs)

There are no applicable greenhouse gases (GHGs) permitting requirements.

Inapplicable requirements in the underlying minor NSR permits:

All of the applicable requirements for the specified emission units in the following Minor NSR permits are considered inapplicable as identified by the applicant:

- *The May 15, 2002 permit for extruder number 5 (emission unit ID 22)*
- *The May 15, 2002 permit for the two pilot plants of the Packaging Technology Center (PTC) (emission unit ID 28) and the Process Development Center (PDC) (emission unit ID 27)*
- *The portion of the May 30, 2001 permit which addresses only the 43 gallon wash tank (previously part of emission unit ID 32)*

These requirements are considered inapplicable as they now are obsolete as emission unit ID 22, emission unit ID 27, emission unit ID 28, and the portion of emission unit ID 32 which included the 43 gallon wash tank have been removed from the facility.

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

COMPLIANCE PLAN

No enforcement compliance plan was required for this source. However, a compliance assurance monitoring (CAM) plan was required as previously implemented in the prior Title V renewal. CAM is required of existing or new large pollutant specific emission units (PSEUs) whose post-control emissions exceed or are equivalent to the major source threshold. A CAM plan was required for Laminator #2's thermal oxidizer, the press parts washing machines' condenser recovery system, and press no. 3's thermal oxidizer. All three of the CAM plans for these three PSEUs include monitoring with the frequency & recordkeeping, performance criteria and an indicator range as indicated under 40 CFR 64 for CAM.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the 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.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation ¹ (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (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	
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	

Emission Unit No.	Emission Unit Description	Citation ¹ (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
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

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

CONFIDENTIAL INFORMATION

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

PUBLIC PARTICIPATION

The proposed permit was placed on public notice in the Style Weekly from August 22, 2012 through close of day on September 21, 2012.

Only EPA's minor comments were received by e-mail during the thirty day public comment period on September 20, 2012. EPA's minor comments were clarified in the same e-mail back to them of which EPA was satisfied as responded back in the September 25, 2012 e-mail. The following is the e-mail thread with EPA's comments and DEQ's responses:

Hi Sherry,
Thank you for the clarifications, I do not need any further information. Thanks.

Cathleen Kennedy Van Osten
EPA Region III
Air Protection Division
Office of Permits and Air Toxics (3AP10)
1650 Arch St.
Philadelphia, PA 19103
215.814.2746
vanosten.cathleen@epa.gov (Please note my new email address)

From: "Tostenson, Sherry (DEQ)" <Sherry.Tostenson@deq.virginia.gov>
To: Cathleen VanOsten/R3/USEPA/US@EPA
Date: 09/25/2012 10:49 AM
Subject: RE: August 22, 2012 Posting of Public Notice Announcement for Reynolds Consumer Products Inc. (Reg. No. 50260)

Hi Cathleen,

Please see my responses to your minor comments within the body of the preceding e-mail. If I have misinterpreted your comments or not clarified them let me know. Otherwise, I did not receive any comments during the public comment period except for yours which ended at the close of day on Friday (9/21/12). If I have addressed your minor comments I am planning on continuing processing this permit for signature possibly today (9/25/12) or tomorrow on Wednesday (9/26/12).

Thanks!
Sherry

From: Cathleen VanOsten [<mailto:VanOsten.Cathleen@epamail.epa.gov>]
Sent: Thursday, September 20, 2012 12:20 PM
To: Tostenson, Sherry (DEQ)
Subject: Re: August 22, 2012 Posting of Public Notice Announcement for Reynolds Consumer Products Inc. (Reg. No. 50260)

Hi Sherry,
I have reviewed the below draft/proposed permit, for Reynolds Consumer Products, Inc. I have a few minor comments, which I feel need some clarification.

-Emissions Units #1,2,3 (boilers). The Emission Unit description chart states, for the 3 boilers, "Primary fuel: Natural Gas, Secondary fuel: #6 fuel oil," **[Tostenson,Sherry] This is correct. This is what they are currently using for fuel.** The permit conditions for these boilers, #1 to #7, refer to the use of Distillate, #4, #5, and #6 fuel oils, and give related emissions factors. **[Tostenson,Sherry] This is also correct. As listed in the emission unit table under "applicable permit date" it is indicated these units are grandfathered/existing sources.** Please clarify the allowable fuels for the boilers, and the proper emissions factors for those fuels.**[Tostenson,Sherry] Since these units are grandfathered/existing sources they are allowed to burn any of these liquid fuels (which are considered fossil fuels*) which meet the standards for particulate matter and sulfur dioxide under Virginia's Emission Standards for Existing Stationary Sources for Fuel Burning Equipment (Rule 4-8).**

[Tostenson,Sherry]

***: Sentence from the definition of “fuel burning equipment” under Rule 4-8:**

“This includes facilities that are designed as boilers to produce steam or heated water and are designed to burn fossil fuel...”

-Emission Units #32-1, 32-2, and 32-3. Permit condition #40 limits the amount of VOC compounds *used* per year (53 tons for #32-1 and 20 tons for #32-2, and a total of 73 tons). Conditions #42 and 43 refer to the same values as *emissions* limits. I understood this to mean that the emissions to throughput is equivalent, **[Tostenson,Sherry] This is correct in your understanding.** but then Condition #53 allows for the use of an emission factor. **[Tostenson,Sherry] The monitoring and recordkeeping condition (Condition #53) addresses the annual emission limit by the use of material balance which is the more readily/definitive method. The emission factor (based on a six month average along with records of the number of batches and emissions) you refer to was listed for compliance of the hourly emission limit of which a mass balance would be a little harder to perform on an hourly basis. It was noted Condition #53 also includes records of the number of cycles/hr each press parts washing machine operated at along with what % VOC cleaning solutions were used for each cycle. This periodic monitoring/recordkeeping is for condition 36 which limits the number of cycles/hr depending upon what solvent solution is used; however, these records also help to substantiate the hourly emission limits as previously discussed. Please clarify.**

Please feel free to contact me if you need additional information. Thanks!

Cathleen Kennedy Van Osten
EPA Region III
Air Protection Division
Office of Permits and Air Toxics (3AP10)
1650 Arch St.
Philadelphia, PA 19103
215.814.2746
vanosten.cathleen@epa.gov (Please note my new email address)

No changes were made to the permit as a result of these minor comments.