

## Air Permit Review

Permit Issue Date: **date, 2012**

**Region:** Raleigh Regional Office  
**County:** Wake  
**NC Facility ID:** 9200278  
**Inspector's Name:** Stanley Williams  
**Date of Last Inspection:** 08/31/2011  
**Compliance Code:** 3 / Compliance - inspection

<p style="text-align: center;"><b>Facility Data</b></p> <p><b>Applicant (Facility's Name):</b> Evergreen Packaging - Raleigh Plant</p> <p><b>Facility Address:</b>          Evergreen Packaging - Raleigh Plant          2215 South Wilmington Street          Raleigh, NC 27603</p> <p><b>SIC:</b> 2657 / Folding Paperboard Boxes  <b>NAICS:</b> 322212 / Folding Paperboard Box Manufacturing</p> <p><b>Facility Classification: Before:</b> Title V    <b>After:</b> Title V  <b>Fee Classification: Before:</b> Title V    <b>After:</b> Title V</p>	<p style="text-align: center;"><b>Permit Applicability (this application only)</b></p> <p><b>SIP:</b>  <b>NSPS:</b>  <b>NESHAP:</b>  <b>PSD:</b>  <b>PSD Avoidance:</b>  <b>NC Toxics:</b>  <b>112(r):</b>  <b>Other:</b></p>
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Contact Data			Application Data
<p style="text-align: center;"><b>Facility Contact</b></p> <p>Jason Williams          Environmental Health and Safety Manager          (919) 821-8228          2215 South Wilmington Street          Raleigh, NC 27603</p>	<p style="text-align: center;"><b>Authorized Contact</b></p> <p>Paul Brang          Plant Manager          (919) 821-8249          2215 South Wilmington Street          Raleigh, NC 27603</p>	<p style="text-align: center;"><b>Technical Contact</b></p> <p>Jason Williams          Environmental Health and Safety Manager          (919) 821-8228          2215 South Wilmington Street          Raleigh, NC 27603</p>	<p><b>Application Number:</b> 9200278.11A  <b>Date Received:</b> 10/25/2011  <b>Application Type:</b> Renewal  <b>Application Schedule:</b> TV-Renewal</p> <p style="text-align: center;"><b>Existing Permit Data</b></p> <p><b>Existing Permit Number:</b> 03912/T18  <b>Existing Permit Issue Date:</b> 09/12/2007  <b>Existing Permit Expiration Date:</b> 08/31/2012</p>

<p><b>Review Engineer:</b> Mark Cuilla</p> <p><b>Review Engineer's Signature:</b>  <b>Date:</b> <b>date, 2012</b></p>	<p style="text-align: center;"><b>Comments / Recommendations:</b></p> <p><b>Issue</b> 03912/T19  <b>Permit Issue Date:</b> <b>date, 2012</b>  <b>Permit Expiration Date:</b> <b>date, 2016</b></p>
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### I. Purpose of Application

The existing Title V permit (**03912T18**) was issued on **September 12, 2007**, and is currently scheduled to expire on **August 31, 2012**. The renewal application was received on **October 25, 2011**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

As part of the renewal application, the Permittee is requesting the following changes:

1. removal of natural gas-fired boiler (**ID No. B-2**);
2. removal of Zerand press (**ID No. ZP**);
3. removal of parts cleaner (**ID No. F**); and
4. addition of five sealers (**ID No. IS-Sealer.1 through IS-Sealer.5**) to the list of insignificant activities.

## II. Facility Description

The facility is a beverage packaging facility whose primary manufacturing activity is the printing of bleached paperboard, which is formed into food and other packaging containers. Operations include painting, coating, cutting, and folding food packaging containers for juices and tomato sauce. Current permitted equipment includes printing presses and boilers.

## III. History/Background/Application Chronology

**September 12, 2007** – Permit **03912T18** issued as a TV renewal permit.

**November 13, 2007** – DAQ responded to an Applicability Determination (No. 1121) received **October 19, 2007** allowing the Permittee to conduct short-term trials using solvent-based adhesives in the three presses and drying ovens without obtaining a permit modification (See Charlie Yirka’s Applicability Determination response dated **November 13, 2007**).

**August 31, 2011** – Stanley Williams of the RRO completed the annual inspection of the facility.

**October 25, 2011** – Permit application **9200278.11A** was received as a TV renewal application. Application was deemed complete for processing.

**November 14, 2011** – Received comments from Dena Pittman/Stamley Williams of the RRO. They noted that the facility has added a new insignificant source: One Window Pak Machine for its coated cartons. This should be added to the permit. *Agree, source has been added.*

**date, 2011** – DRAFT permit sent to Permittee, Supervisor, and Regional Office for comment prior to the public notice and EPA review periods.

**date, 2011** – DRAFT permit sent to 30-day public notice and 45-day EPA review.

## IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Page(s)	Section	Description of Change(s)
Attachment	Insignificant activities	-amended permit revision number -added sealers ( <b>ID Nos. IS-Sealer.1 through IS-Sealer.5</b> ) per renewal application -added window Pak machine per RRO request -added shell asterisk language
Cover	-	-amended permit revision numbers and all dates
TOC	-	-removed reference to Part II here and throughout permit
All	Header	-amended permit revision number
3	Equipment table 2.1 A 2.1 A.1.a 2.1 A.1.b 2.1 A.1.c	-removed boiler ( <b>ID No. B-2</b> ), Zerand press ( <b>ID No. ZP</b> ), and parts washer ( <b>ID No. F</b> ) per renewal application -removed reference to boiler ( <b>ID No. B-2</b> ) -removed reference to boiler ( <b>ID No. B-2</b> ) -corrected testing rule cross reference -removed reference to boiler ( <b>ID No. B-2</b> )

Page(s)	Section	Description of Change(s)
4	2.1 A.2.a 2.1 A.2.b 2.1 A.2.c 2.1 A.3.a 2.1 A.3.b 2.1 A.3.c	-removed reference to boiler ( <b>ID No. B-2</b> ) -corrected testing rule cross reference -removed reference to boiler ( <b>ID No. B-2</b> ) -removed reference to boiler ( <b>ID No. B-2</b> ) -corrected testing rule cross reference -removed reference to boiler ( <b>ID No. B-2</b> )
5	2.1 B.1.b 2.1 B.2.b 2.1 B.3.b	-corrected testing rule cross reference -corrected testing rule cross reference -corrected testing rule cross reference
6	2.1 B.3.c.ii 2.1 C 2.1 C.(table)	-updated shell visible emissions monitoring language -removed reference to Zerand press ( <b>ID No. ZP</b> ) -removed reference to 2D .0516 with removal of Zerand press ( <b>ID No. ZP</b> )
7	2.1 C.1.a 2.1 C.1.b 2.1 C.1.c 2.1 C.2 (old)  2.1 C.2.a 2.1 C.2.b  2.1 C.2.c 2.1 D (old)	-removed reference to Zerand press ( <b>ID No. ZP</b> ) -corrected testing rule cross reference -removed reference to Zerand press ( <b>ID No. ZP</b> ) -removed permit condition 2D .0516 (renumbered subsequent paragraphs) -removed reference to Zerand press ( <b>ID No. ZP</b> ) -corrected testing rule cross reference and corrected paragraph cross reference -removed reference to Zerand press ( <b>ID No. ZP</b> ) -removed section because of parts washer removal (renumbered subsequent paragraphs)
8	2.1 D.1.b  2.1 D.2.b	-corrected testing rule cross reference and corrected paragraph cross reference  -corrected testing rule cross reference and corrected paragraph cross reference
9	2.1 D.3.b	-corrected testing rule cross reference and corrected paragraph cross reference
10	2.2 B.1.a	-amended 2D .0958 language to remove reference to “15 pound per day” language per rule change
11	2.2 C 2.2 C.1.a	-removed reference to Zerand press ( <b>ID No. ZP</b> ) and parts washer ( <b>ID No. F</b> ) -removed reference to Zerand press ( <b>ID No. ZP</b> ) and parts washer ( <b>ID No. F</b> )
13-22	General Conditions	-updated shell conditions (v3.5)
23	List of Acronyms	-added acronyms for CAIR, NAA, and RACT

The following table indicates the modifications to TVEE as a result of this permit renewal:

Current Description	Change resulting from permit renewal
One natural gas-fired boiler (12.5 million Btu per hour maximum heat input capacity; <b>ID No. B2</b> )	End-dated per Permittee request
One Zerand Press consisting of eight print stations with eight natural gas-fired ovens installed one each ( <b>ID No. ZP</b> )	End-dated per Permittee request
One parts cleaner ( <b>ID No. F</b> )	End-dated per Permittee request

Current Description	Change resulting from permit renewal
NA	Five natural gas-fired sealers (1.2, 1.2, 1.2, 1.2, and 1.95 million Btu per hour heat input capacities, respectively; <b>ID Nos. IS-Sealer.1 through IS-Sealer.5</b> )
NA	One Window Pak Machine for coated cartons ( <b>ID No. I-WPM</b> )

## V. Regulatory Review

The facility is currently subject to the following regulations:

- 15A NCAC 2D .0503, Particulates from Fuel Burning Indirect Heat Exchangers
- 15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes
- 15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources
- 15A NCAC 2D .0521, Control of Visible Emissions
- 15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions
- 15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds
- 15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .0530 and 15A NCAC 2D .1111)
- 15A NCAC 2Q .0711, Emission Rates Requiring a Permit

A regulatory review for these existing requirements will not be included in this document. No new regulations are proposed as part of this permit renewal. It should be noted that the removal of boiler (**ID No. B-2**) does not affect the allowable particulate emission rate of the remaining boiler (**ID No. B-1**) per 15A NCAC 2D .0503.

## VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

**NSPS** – The facility is not currently subject to a New Source Performance Standard. This permit renewal does not affect this status.

**NESHAPS/MACT** – The facility currently operates under an enforceable permit condition limiting facility-wide emissions of any single hazardous air pollutant and combination of all hazardous air pollutants to less than 10 tons and 25 tons per year, respectively. This permit renewal does not affect this status.

By virtue of this avoidance condition, the facility is classified as a Title III minor facility potentially subject to applicable area source GACTs. 40 CFR 63 Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources was reviewed for applicability to the combustion sources at the facility. 40 CFR 63.11195(e) exempts gas-fired boilers from this Subpart and to any requirements of the Subpart. Pertinent definitions include the following:

- (1) *Gaseous fuels includes, but is not limited to, natural gas, process gas, landfill gas, coal derived gas, refinery gas, hydrogen, and biogas.*
- (2) *Gas-fired boiler includes any boiler that burns gaseous fuels not combined with any solid fuels, burns liquid fuel only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.*

The Permittee operates only natural gas-fired units at this facility; therefore, the GACT is not applicable to the facility. This permit renewal does not affect this status.

It should also be noted that 40 CFR 63.10(b)(3) requires that the Permittee keep records of the applicability determination on site at the source for a period of five years after the determination or until the source becomes an affected source. The determination must include the analysis demonstrating why the Permittee believes the source is unaffected. The Permittee has chosen to limit its emissions to below the major source threshold in order to specifically avoid compliance with 40 CFR 63, Subpart KK (National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry). The compliance date for this Subpart was **May 30, 1999**. This date is more than five years ago; therefore, the reference to compliance with 63.10 is not necessary as part of this renewal.

**PSD** – The facility is currently operating under an enforceable permit condition limiting volatile organic compound emissions from the co-extruding laminating line (**ID No. E1**) and the Komori Chambon web offset lithographic press (**ID No. L1**) to less than 250 tons per year. This permit renewal does not affect this status. However, the permit condition was modified to remove references to the Zerand press (**ID No. ZP**) and parts cleaner (**ID No. F**) because the Permittee has requested that they be removed from the permit.

**112(r)** – The facility is not currently subject to the 112(r) “Prevention of Accidental Releases” requirements because no chemicals are stored in amounts greater than the applicability threshold of the regulation.

**CAM** – 40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. No control devices are present at the facility; therefore, CAM does not apply. This permit renewal does not affect this status.

## VII. Facility-Wide Air Toxics

The Permittee is currently subject to 15A NCAC 2Q .0711, “Emission Rates Requiring a Permit” for facility-wide emissions of ethyl acetate. The Permittee has made a demonstration that facility-wide emissions do not exceed the toxic permit emission rate (TPER). The facility is required to be operated and maintained in such a manner that emissions of ethyl acetate will not exceed this rate. Prior to exceeding this rate, the Permittee is required to submit a permit application to demonstrate compliance with 15A NCAC 2D .1100, “Control of Toxic Air Pollutants.” The Permittee is required to maintain records of operation information demonstrating that ethyl acetate does not exceed the TPER.

## VIII. Facility Emissions Review

There is no change in emissions for this renewal.

The following table represents the latest years’ emission inventories from the facility:

Pollutant(s)	2009 Actual Emissions (tpy)	2010 Actual Emissions (tpy)
CO	1.01	1.04
NO <sub>x</sub>	1.19	1.21
PM <sub>10</sub>	0.1	0.1
VOC	16.40	15.71
Total HAP/TAP	0.32	0.33

## **IX. Stipulation Review**

The facility was last inspected by Stanley Williams of the RRO on **August 31, 2011**. At that time of the inspection, the facility appeared to be in compliance with the applicable air quality regulations. He noted no necessary permit modifications.

## **X. Public Notice/EPA and Affected State(s) Review**

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 2Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. There are no affected areas within 50 miles of this facility.

## **XI. Conclusions, Comments, and Recommendations**

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

RRO recommends issuance of the permit and was presented with a DRAFT permit prior to notice and issuance.

RCO concurs with RRO's recommendation to issue the renewed air permit.