

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Air Permit Review**

Permit Issue Date: **date, 2007**

**Region:** Raleigh Regional Office  
**County:** Wake  
**NC Facility ID:** 9200278  
**Inspector's Name:** Brian Bland  
**Date of Last Inspection:** 04/20/2007  
**Compliance Code:** 3/In Compliance - Inspection

<b>Facility Data</b>	<b>Permit Applicability (this application only)</b>
<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><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>

<b>Contact Data</b>			<b>Application Data</b>
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<p><b>Application Number:</b> 9200278.06A  <b>Date Received:</b> 11/15/2006  <b>Application Type:</b> Renewal  <b>Application Schedule:</b> TV-Renewal  <b>Existing Permit Data</b>  <b>Existing Permit Number:</b> 03912/T17  <b>Existing Permit Issue Date:</b> 03/16/2007  <b>Existing Permit Expiration Date:</b> 10/31/2007</p>
Jason Williams Environmental Health and Safety Manager (919) 821-8228 2215 South Wilmington Street Raleigh NC, 27603	Derek Owens Plant Manager (919) 821-8245 2215 South Wilmington Street Raleigh NC, 27603	Jason Williams Environmental Health and Safety Manager (919) 821-8228 2215 South Wilmington Street Raleigh NC, 27603	

<p><b>Review Engineer:</b> Mark Cuilla</p> <p><b>Review Engineer's Signature:</b>  <b>Date:</b> <b>date, 2007</b></p>	<p style="text-align: center;"><b>Comments / Recommendations:</b></p> <p><b>Issue</b> 03912/T18  <b>Permit Issue Date:</b> <b>date, 2007</b>  <b>Permit Expiration Date:</b> <b>date, 2012</b></p>
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**I. Purpose of Application**

The permit is being modified as follows:

1. The existing Title V permit (**03912T17**) was issued on **March 16, 2007**, and is currently scheduled to expire on **October 31, 2007**. The renewal application was received on **November 15, 2006**, 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 has made the following requests:

- i. remove the waterborne press gas burner (0.72 million Btu per hour) and waterborne flexographic press as being never installed. *It should be noted that this request is no longer valid per the issuance of 03912T17;*
- ii. request reduction in reporting frequency requirement for both individual and total HAP emissions as part of the MACT avoidance condition from quarterly to semi-annually; and

iii. request to change the submission date for the compliance certification contained in General Condition P from a postmarked date of January 30 to March 1 per current policy. *It should be noted that this was completed as part of the issuance of 03912T17.*

2. Change in ownership. The Permittee submitted a request for ownership change/name change on **January 3, 2007**. The Permittee requested that the current owner International Paper be changed to Evergreen Packaging, Inc. In addition, the facility name is being changed from International Paper, Beverage Packaging Division to Evergreen Packaging – Raleigh Plant. A check with the NC Secretary of State website indicates that this Corporation was established **January 25, 2007** and is current. *It should be noted that this was completed as part of the issuance of 03912T17.*

3. Response to Last MACT/air toxics add info letter. The Permittee submitted a response to DAQ's add info letter. The Permittee responded that the facility operates under a MACT avoidance condition, limiting its facility-wide HAP emissions to below major source thresholds. Therefore, the Permittee is not required to complete an air toxics demonstration for all permitted equipment. See Section VII of this Document for a discussion.

## **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**

**November 19, 2002** – Permit **03912T16** was issued as an initial Title V permit.

**November 3, 2005** – Permit application **9200278.05A** was received as a State only modification in response to DAQ's request for Last MACT/air toxics demonstration updates. See Section VII of this Document for a discussion. This application was consolidated into the renewal application.

**November 15, 2006** – Permit application **9200278.06A** was received as a Title V renewal application. The permit application was deemed complete for processing.

**January 3, 2007** – Permit application **9200278.07A** was received as an Ownership/Name change. This application was consolidated into the renewal application.

**March 16, 2007** – Permit 03912T17 was issued as a minor modification for the construction of two waterborne flexographic presses (**ID Nos. WB2 and WB3**) and for the removal of one Chestnut press and solvent recovery system (**ID No. CP and SRS1**) respectively.

**June 29, 2007** – Permittee confirmed that Section 3.2 of the renewal application requesting removal of waterborne press (**ID No. WB1**) should be ignored and that one of the drying ovens installed on the UV press (**ID No. UV Press**) is actually an electric oven rather than natural gas.

**July 11, 2007** – DRAFT permit sent to Permittee, Title V Coordinator, and Regional Office for comment prior to the public notice and EPA review periods. Received comments were all incorporated prior to public notice.

**Date, 2007** – 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
Cover	-	-amended all permit revision numbers and all dates
All	Header	-amended permit revision number
3	Equipment table	-modified equipment description where necessary -removed asterisk language for previous minor modification
4	2.1 A.1.a 2.1 A.1.b 2.1 A.1.c 2.1 A.2.a 2.1 A.2.c	-added ID Nos. -updated shell language -updated shell language and added ID Nos. -added ID Nos. -added ID Nos.
5	2.1 A.3.a 2.1 A.3.c 2.1 B 2.1 B (table) 2.1 B.1.a	-updated shell language -added ID Nos. -amended equipment descriptions -corrected rule citation -added ID Nos.
6	2.1 B.1.b 2.1 B.1.c 2.1 B.2.a 2.1 B.2.c 2.1 B.3.a 2.1 B.3.c	-updated shell language -added ID Nos. -updated shell language -added ID Nos. -updated shell language -updated shell language and added ID Nos.
7	2.1 B.3.c (cont) 2.1 C 2.1 C (table)	-updated shell language -amended equipment descriptions -added ID Nos. and corrected rule citations
8	2.1 C.1.b 2.1 C.1.c 2.1 C.2.c 2.1 C.3.c	-updated shell language -added ID Nos. -updated shell language and added ID Nos. -added ID Nos.
9	2.1 D (table) 2.1 E 2.1 E (table)	-corrected rule citations -amended equipment descriptions -added ID Nos. and corrected rule citation
10	2.1 E.1.a 2.1 E.1.b 2.1 E.1.c 2.1 E.2.a 2.1 E.2.c 2.1 E.3.a	-updated shell language -updated shell language -added ID Nos. -added ID Nos. -added ID Nos. -updated shell language
11	2.1 E.3.c 2.2 A.2 2.2 A.2.c (table)	-added ID Nos. -corrected rule citation -added CAS number
12	2.2 B.1.c-d	-added 2D .0958 MRR requirements

Page(s)	Section	Description of Change(s)
13	2.2 B.1.d-e 2.2 C 2.2 C (table) 2.2 C.1 2.2 C.1.a 2.2 C.1.d	-added 2D .0958 MRR requirements -amended equipment description -clarified emission limit and corrected rule citation -corrected rule citation -added ID Nos. -amended quarterly reporting to semi-annual
14	2.2 D (table) 2.2 D.1 2.2 D.1.d	-corrected rule citation -corrected rule citation -amended quarterly reporting to semi-annual
-	Part II	-removed Part II as no longer necessary

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

Current Description	Change resulting from permit renewal
two natural gas-fired boilers (12.5 million Btu per hour heat input rate each; <b>ID Nos. B-1 and B-2</b> )	<i>Two</i> natural gas-fired boilers (12.5 million Btu per hour <i>maximum</i> heat input <i>capacity</i> ; <b>ID Nos. B-1 and B-2</b> )
one Klockner co-extruding laminating line including a primary coater followed by one natural gas-fired oven ( <b>ID No. E-1</b> )	<i>One</i> Klockner co-extruding laminating line including primary coater <i>with two natural gas-fired pretreaters, one natural gas-fired post-treater, and one natural gas-fired oven</i> ( <b>ID No. E-1</b> )
Zerand Press consisting of eight print stations each followed by eight natural gas-fired ovens installed one each on the eight print stations ( <b>ID No. ZP</b> )	<i>One</i> Zerand Press consisting of eight print stations <i>with eight natural gas-fired ovens installed one each</i> ( <b>ID No. ZP</b> )
28" Komori Chambon web offset lithographic press consisting of eight print stations ( <b>ID No. L1</b> )	<i>One</i> 28" Komori Chambon web offset lithographic press consisting of eight print stations ( <b>ID No. L1</b> )
one UV flexographic press with 12 print stations (11 stations with UV curing oven and one with natural gas-fired oven) and one Corona treater ( <b>ID No. UV Press</b> )	<i>One</i> UV flexographic press with 12 print stations (11 stations with <i>one</i> UV curing oven <i>each</i> and one with <i>an electric</i> oven) and one Corona treater ( <b>ID No. UV Press</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.

## 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 a federally 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. The Permittee is required to comply with the following permit condition. Continued compliance is expected. It should be noted that the Permittee has requested that the reporting period for this condition be modified from quarterly to semi-annually. This modification is current DAQ practice for all reporting periods except for NC air toxics (where the General Statutes require quarterly).

### 1. *15A NCAC 2Q .0317: AVOIDANCE CONDITIONS for 15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY*

- a. *In order to remain classified a minor source for hazardous air pollutants (HAPs) and avoid applicability of this regulation, facility emissions shall be less than:
  - i. 10 tons per year of each HAP; and
  - ii. 25 tons per year of all HAPs combined.The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1111 if the HAP emissions exceed these limits.*

#### **Monitoring/Recordkeeping** [15A NCAC 2Q .0508(f)]

- b. *The Permittee shall maintain monthly consumption records of each material used containing HAPs as follows:
  - i. quantity of individual HAPs in pounds used by the facility each month and for the 12-month period ending on that month; and
  - ii. quantity of all HAPs in pounds used by the facility each month and for the 12-month period ending on that month.*
- c. *The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1111 if these HAP emissions are not monitored or records are not maintained or if HAP emissions exceed any limit in Section 2.2 D.1.a above.*

#### **Reporting** [15A NCAC 2Q .0508(f)]

- d. *The Permittee shall submit a summary report of the monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. The report shall contain the monthly HAP emissions for the previous 17 months. The emissions must be calculated for each of the 12-month periods over the previous 17 months.*

It should be noted that 40CFR63.10(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 a federally-enforceable permit condition limiting volatile organic compound emissions from the co-extruding laminating line (**ID No. E1**), the Zerand press (**ID No. ZP**), the Komori Chambon web offset lithographic press (**ID No. L1**), and the parts cleaner (**ID No. F**) to less than 250 tons per year. The Permittee is required to comply with the following permit condition. It should be noted that the reporting period for this condition has been changed from quarterly to semi-annually per current DAQ practice.

**1. 15A NCAC 2Q .0317: AVOIDANCE CONDITIONS  
for 15A NCAC 2D .0530: PREVENTION OF SIGNIFICANT DETERIORATION**

- a. *In order to avoid the applicability of this regulation, the above emission sources (**ID Nos. E1, ZP, L1, and F**) shall discharge into the atmosphere less than 250 tons of VOCs per consecutive 12-month period combined.*

**Monitoring/Recordkeeping** [15A NCAC 2Q .0508(f)]

- b. *Calculations of VOC emissions per month shall be made at the end of each month. VOC emissions shall be determined by multiplying the total amount of each type of VOC-containing material consumed during the month by the VOC content of the material. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if the amounts of VOC containing materials or the VOC emissions are not monitored and recorded.*
- c. *Calculations and the total amount of VOC emissions shall be recorded monthly in a logbook (written or electronic format). The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if the VOC emissions exceed this limit.*

**Reporting** [15A NCAC 2Q .0508(f)]

- d. *The Permittee shall submit a summary report of the monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. The report shall contain the monthly VOC emissions for the previous 17 months. The emissions must be calculated for each of the 12-month periods over the previous 17 months.*

**112(r)** – The Permittee is not subject to the 112(r) “Prevention of Accidental Releases” requirements because he does not store any chemicals in amounts greater than the applicability threshold.

**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 inventory from the facility:

Pollutant(s)	2005 Actual Emissions (tpy)
CO	1.43
NO <sub>x</sub>	1.67
PM <sub>10</sub>	0.12
SO <sub>2</sub>	0.01
VOC	76.35
Total HAP/TAP	0.337

### IX. Stipulation Review

The Raleigh Regional Office did not request any clarifications/modifications of the permit as a result of this renewal application. However, Brian Bland of RRO in his latest inspection made the following observations:

1. the waterborne flexographic press (**ID No. WB**) is permitted but has not been installed yet. The facility requested in a letter dated June 22, 2005 that this press and associated natural gas fired burner be removed from the permit, as there are no longer plans to install this equipment. *(It should be noted that this request is no longer valid with the issuance of 03912T17);* and
2. The UV press gas burner is actually an electric burner and should be updated in the next permit revision. *This was verified by the Permittee on June 29, 2007. Permit and ESM will be modified accordingly.*

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

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall be placed in a newspaper of general circulation in the area where the facility is located. 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 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 States or Local Programs 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.