



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

PIEDMONT REGIONAL OFFICE

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Molly Joseph Ward
Secretary of Natural Resources

David K. Paylor
Director

Michael P. Murphy
Regional Director

STATIONARY SOURCE PERMIT TO OPERATE

This permit implements the requirements for Reasonably Available Control Technology (RACT) for Volatile Organic Compounds (VOC) in the Richmond, Virginia Emissions Control Area.

This permit (i) is for the purpose of implementing the "reasonably available control technology" (RACT) requirements of 9 VAC 5-40-7390 of the Regulations of the Board and (ii) establishes control technology and other requirements for the control of volatile organic compound (VOC) emissions from the Reynolds Consumer Products LLC – Bellwood Printing Plant in the Richmond, Virginia Ozone Maintenance Area. These RACT requirements shall be the legal and regulatory basis for control of VOC emissions from this facility. This permit shall be effective upon approval by the U. S. Environmental Protection Agency following the requirements of 40 CFR Part 51 (Requirements for Preparation, Adoption, and Submittal of Implementation Plans) and upon such approval this permit shall supersede your consent order dated October 31, 1986.

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

Reynolds Consumer Products LLC
Bellwood Printing Plant
2001 Reymet Road
Richmond, VA 23237
Registration No.: 50260

is authorized to operate

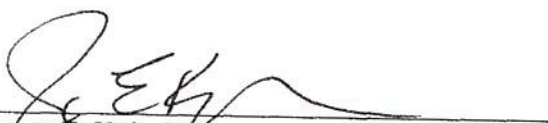
a printing facility

located at

2001 Reymet Road
Chesterfield County, Virginia

in accordance with the Conditions of this permit.

Approved on October 20, 2015.


James E. Kyle, P.E.
Air Permit Manager

Permit consists of 5 pages.
Permit Conditions 1 to 15.

INTRODUCTION

This permit approval is based on the permit application dated August 13, 2015, and supplemental information dated August 27, 2015. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.

Words or terms used in this permit shall have meanings as provided in 9 VAC 5-10-20 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. The regulatory reference or authority for each condition is listed in parentheses () after each condition.

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

Group A Facilities		
<i>The Group A Facilities at the Plant* are: Presses Number 1, 2, 4, Extruders Number 1, 2, and 3, and the treating station for Press Number 3. **</i>		
Unit ID	Equipment Description	Rated Capacity
21-1	Champlain Press 1 with a 55 inch max. web width for film, foil and paper (1975)	850 ft/min
21-2	Champlain Press 2 for film, foil and paper (pre-1975)	800 ft/min
21-3	Champlain Press 3 (treating station only)	N/A
21-4	Champlain Press 4 for film, foil and paper (pre-1975)	710 ft/min
21-10	Egan Extruder 1 for film, foil and paper (pre-1975)	1,010 ft/min
21-11	Dilts/Egan Tandem 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
Additional Equipment		
24	Intra Roto Laminator 3 for film, foil and paper (pre-1975)	1,000 ft/min

Specifications included in the above tables are for informational purposes only and do not form enforceable terms or conditions of the permit.

* "Plant" refers to Reynolds Consumer Products LLC (- Bellwood Printing Plant) in Chesterfield County.

**The following equipment referenced in the Consent Order and Agreement dated October 31, 1986 has been dismantled and removed from the Plant: Presses 6, 8, 9, 10 and 11, and Extruder 4.

PROCESS REQUIREMENTS – VOC Emission Controls

1. **Emission Controls** – Volatile Organic Compound emissions from the affected facilities at the Plant shall be controlled and reduced as outlined in this permit.
(9 VAC 5-40-7370 and 9 VAC 5-80-850)
2. **Emission Controls** – The “Group A facilities” at the Plant are: Presses Number 1, 2, and 4, Extruders Number 1, 2, and 3, and the treating station for Press Number 3.
(9 VAC 5-40-7370 and 9 VAC 5-80-850)
3. **Control Efficiency** - 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 5-40-7370 and 9 VAC 5-80-850)
4. **Monitoring** – Compliance with the requirements of Conditions 2 and 3 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.
(9 VAC 5-40-7370 and 9 VAC 5-80-850)

EMISSIONS LIMITATIONS

5. **Process Emission Limits** – The Board has determined that RACT for No. 3 Laminator is an emission limit of 2.0 tons per day. Attachment B to this permit outlines the basis for this determination.
(9 VAC 5-40-7370 and 9 VAC 5-80-850)

RECORDS

6. **On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Piedmont Regional Office. These records shall include, but are not limited to:

Records consisting of information as to the calculated daily reduction in emissions of Volatile Organic Compounds from the Group A facilities, except those emissions treated by add-on control equipment at the Plant.

These records shall be available for inspection by the DEQ and shall be current for the most recent two years.
(9 VAC 5-40-7370 and 9 VAC 5-80-850)

NOTIFICATIONS

7. **Exception Reports** – Reynolds Consumer Products LLC shall provide the Board an exception report at the end of any quarter when conditions 1, 2, or 3 of this permit are not met.
(9 VAC 5-80-850)

TESTING

8. **Emission Testing** - The printing facility shall be constructed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. Sampling ports shall be provided when requested at the appropriate locations, and safe sampling platforms and access shall be provided.
(9 VAC 5-80-880 and 9 VAC 5-80-850)

GENERAL CONDITIONS

9. **Relationship to Other Permit Requirements** – Except to the extent that conditions in this permit may be more stringent, this permit does not supersede or replace any other valid permit, or any other regulatory or statutory requirement. Furthermore, this approval to operate shall not relieve Reynolds Consumer Products LLC of the responsibility to comply with all other local, state and federal regulations, including permit regulations.
(9 VAC 5-80-800 D and 9 VAC 5-80-820 F)
10. **Federal Enforceability** – Once this permit is approved by the U.S. Environmental Protection Agency into the Commonwealth of Virginia State Implementation Plan, the permit is enforceable by EPA and citizens under the federal Clean Air Act.
(9 VAC 5-80-800 C.2 and 9 VAC 5-80-820 F)
11. **Permit Modification** – The Board may revise (modify, rewrite, change or amend) or repeal this permit with the consent of Reynolds Consumer Products LLC, for good cause shown by Reynolds Consumer Products LLC, or on its own motion provided approval of the revision or repeal is accomplished in accordance with the Regulations of the Board and the Administrative Process Act (§2.2-4000 et seq.). Such revision or repeal shall not be effective until the revision or repeal is approved by the U.S. Environmental Protection Agency following the requirements of 40 CFR Part 51 (Requirements for Preparation, Adoption, and Submittal of Implementation Plans).
(9 VAC 5-80-960 and 5-80-1000)
12. **Failure to Comply** – Failure by Reynolds Consumer Products LLC to comply with any of the conditions of this permit shall constitute a violation of a Permit of the Board. Failure to comply may result in a Notice of Violation and civil penalty. Nothing herein shall waive the initiation of appropriate enforcement actions or the issuance of orders as appropriate by the Board as a result of

such violations. Nothing herein shall affect appropriate enforcement actions by any other federal, state, or local regulatory authority.

(9 VAC 5-80-820 F, 9 VAC 5-80-910, and 9 VAC 5-80-1010)

13. **Right of Entry** - The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:
- a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;
 - c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and
 - d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.

(9 VAC 5-170-130 and 9 VAC 5-80-850)

14. **Change of Ownership** - In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall notify the Piedmont Regional Office of the change of ownership within 30 days of the transfer.
(9 VAC 5-80-940)
15. **Permit Copy** - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.
(9 VAC 5-80-860 D)

