

# Puget Sound Clean Air Agency

1904 3rd Ave, Ste 105, Seattle, WA 98101-3317; Gerry Pade (206) 689-4065

## Point Source Emission Report

April 28, 2009

**PLIANT CORP**

Facility ID #: 28777

AFS#: 053-033-00157

### Section 4 - Facility Emission Summary

CAS#	Flags	Air Contaminants:	pounds/ 2007	tons / 2007	pounds/2008	tons /2008
2807-30-9	V	2-Propoxy-ethanol	555	<1	_____	_____
7664-41-7	T	Ammonia (NH3)	_____	_____	_____	_____
123-42-2	VT	Diacetone alcohol	464	<1	_____	_____
34590-94-8	VT	Dipropylene glycol methyl ether	198	<1	_____	_____
141-78-6	VT	Ethyl acetate	5,222	3	_____	_____
64-17-5	VT	Ethyl alcohol (Ethanol)	4,104	2	_____	_____
GLYET	VTH	Glycol ethers	97	<1	_____	_____
142-82-5	VT	Heptane (n-Heptane)	758	<1	_____	_____
108-21-4	VT	Isopropyl acetate	1,259	<1	_____	_____
67-63-0	VT	Isopropyl alcohol (Isopropanol)	920	<1	_____	_____
67-56-1	VTH	Methyl alcohol (Methanol)	_____	_____	_____	_____
108-10-1	VTH	Methyl isobutyl ketone (MIBK; Hexone)	_____	_____	_____	_____
123-86-4	VT	n-Butyl acetate	1	<1	_____	_____
109-60-4	VT	n-Propyl acetate	5,381	3	_____	_____
71-23-8	VT	n-Propyl alcohol	40,091	20	_____	_____
43207	V	Other Volatile Organic Compounds (VOC)	2,311	1	_____	_____
64742-89-8	V	Petroleum naphtha, paraffins & naphthenes	7	<1	_____	_____
107-98-2	VT	Propylene glycol mono-methyl ether	173	<1	_____	_____
108-88-3	VTH	Toluene	1	<1	_____	_____
1330-20-7	VTH	Xylenes	_____	_____	_____	_____
Volatile Organic Compounds Total (V)			61,542	31	_____	_____
Toxic Air Contaminants Total (T)			58,669	29	_____	_____
Hazardous Air Pollutants Total (H)			98	<1	_____	_____



# Puget Sound Air Pollution Control Agency

HEREBY ISSUES AN ORDER OF APPROVAL TO CONSTRUCT, INSTALL, OR ESTABLISH

Notice of Construction No. 2839

Date DEC 12 1986

One GMS Model 2600 Proof Press

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T

Mr. Ronald L. Jackson  
Princeton Packaging, Inc.

Same

8039 South 192nd Street

NAME

Kent, WA 98032

STREET

STREET

CITY

STATE

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CITY

STATE

INSTALLATION ADDRESS

8039 South 192nd Street

Kent

WA 98032

STREET

CITY

STATE

THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

- Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Air Pollution Control Agency to the applicant to install, alter or establish the equipment, device or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of PSAPCA.
- Compliance with this ORDER and its conditions does not relieve the owner or operator from the responsibility of compliance with Regulations I or II, RCW 70.94, or any other emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply.
- This approval does not relieve the applicant or owner of any requirement of any other governmental agency.

4. Records of the annual number of proofs shall be kept for two years after the record is made. Annual VOC emissions from the press shall be reported in the emission inventory report.

  
 J. L. Nolan  
 Reviewing Engineer

  
 A. R. Dammkoehler  
 Air Pollution Control Officer

jp

# Puget Sound Air Pollution Control Agency

HEREBY ISSUES AN ORDER OF APPROVAL  
TO CONSTRUCT, INSTALL, OR ESTABLISH

Registration No. 28777

Notice of  
Construction No. 6031

Date JUN 30 1995

(Canceled - See Order  
of Approval No. 8447)

Three 60" Kidder Flexographic Presses, Two 54" Kidder Flexographic Presses and one 29" PCMC Flexographic Press, all controlled by one Smith/Angull Catalytic Incinerator; and one 27 gallon Cold Solvent Cleaner.

JAMES NEWMAN

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HUNTSMAN DESIGN PRODUCTS CORP  
8039 S 192ND ST  
KENT WA 98032

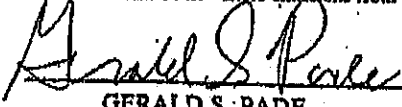
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HUNTSMAN DESIGN PRODUCTS CORP  
8039 S 192ND ST  
KENT WA 98032

### INSTALLATION ADDRESS

HUNTSMAN DESIGN PRODUCTS CORP, 8039 S 192ND ST, KENT, WA, 98032

### THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

1. Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Air Pollution Control Agency to the applicant to install or establish the equipment, device or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of PSAPCA.
2. Compliance with this ORDER and its conditions does not relieve the owner or operator from the responsibility of compliance with Regulations I, II or III, RCW 70.94 or any other emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply. Section 5.05(e) of Regulation I requires that the owner or operator must develop and implement an operation and maintenance (O&M) plan to assure continuous compliance with Regulations I, II, and III.
3. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.
4. This Order of Approval No. 6031 hereby supersedes and cancels Orders of Approval No. 2703 dated Dec 2, 1985, No. 2868 dated April 7, 1987 and No. 3182 dated Jan 23, 1989.
5. Emissions shall be incinerated with a destruction efficiency of at least 90%.
6. Emissions from the Kidder presses shall be collected with a capture efficiency of at least 60%.
7. Emissions from the PCMC press shall be collected with a capture efficiency of at least 90%.
8. Compliance with the capture efficiency requirements shall be demonstrated by conducting a source test within 60 days of start-up of the PCMC press and shall be defined by a production rate weighted average of the capture efficiency requirements of the presses in operation during the test.
9. Compliance with the destruction efficiency requirement shall be demonstrated by conducting a source test within 60 days of start-up of the PCMC press and biennially thereafter.
10. Source tests shall be conducted in accordance with the methods incorporated in the test plan received by the Agency on June 7, 1995.
11. Simultaneous operation of the presses shall be limited to the number of presses in operation during the most recent source test; however, an additional press may be operated if the most recent tests exceeded the capture and destruction efficiency requirements by more than 4%.
12. The temperature controller setting of the incinerator shall be 700 degrees Fahrenheit unless the most recent source test demonstrates compliance with the destruction efficiency requirements at a lower setting, which shall establish a new limitation.
13. The temperature at the inlet and outlet of the incinerator shall be continuously monitored and recorded.
14. Temperature records shall be maintained on site for at least two years.
15. Thermocouples on the incinerator shall be audited annually.
16. Samples of the catalyst shall be analyzed for activity semiannually.
17. There shall be no visible emissions from the incinerator.

  
GERALD S. PADE  
Reviewing Engineer  
MEJ

  
JAY M. WILLENBERG  
Reviewing Engineer

  
for DENNIS J. McLERRAN  
Air Pollution Control Officer



# Puget Sound Clean Air Agency

Notice of  
Construction No. 9295

Registration No. 28777

Date 5/12/2009

## HEREBY ISSUES AN ORDER OF APPROVAL TO CONSTRUCT, INSTALL, OR ESTABLISH

Alteration of control equipment configuration. The least used presses (Soloflex, Kidder) would be controlled by the least efficient catalytic oxidizer (Smith/Anguill). The Olympia press would be controlled by the Dec-E-Tec 20000 catalytic oxidizer to allow the Infinity press to be controlled by the Dec-E-Tec 5000 catalytic oxidizer. All other presses (Vision, Stellaflex, Astraflex) would continue to be controlled by the Dec-E-Tec 20000 catalytic oxidizer.

### APPLICANT

Dwyane Nichols  
Pliant Corp  
8039 S 192nd St  
Kent, WA 98032

### OWNER

Pliant Corp  
8039 S 192nd St  
Kent, WA 98032

### INSTALLATION ADDRESS

Pliant Corp, 8039 S 192nd St, Kent, WA, 98032

### THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

1. Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Clean Air Agency to the applicant to install or establish the equipment, device or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of the Puget Sound Clean Air Agency.

2. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.

#### Capture Efficiency

3. Pliant shall not operate the presses unless at least 90% of the emissions from each press (60% of the emissions from the Kidder press), are captured and ducted to an oxidizer, as determined by EPA Method 308 and the test plan for the Infinity press dated 4/24/01.

4. Pliant shall conduct source tests to verify compliance with Condition 3 of this Order within 60 days of connecting any presses to an oxidizer. Pliant shall also use smoke tubes to verify compliance with this requirement within 24 hours after performing any maintenance or adjustments that could adversely affect the capture efficiency.

5. Pliant shall not operate the presses connected to the Dec-E-Tec oxidizers unless the dryers are equipped with LEL sensors that are electronically interlocked with the press to prevent their operation whenever the VOC concentration exceeds 50% of the LEL. Pliant shall audit these interlock systems in accordance with the manufacturer's recommendations annually (unless the equipment is not used during that period).

6. Pliant shall not operate the presses connected to the Smith/Anguill oxidizer unless the ductwork is equipped with a static pressure sensor that is electronically interlocked with the presses to prevent their operation whenever the static pressure falls below -0.5" w.g. (i.e., closer to zero). Pliant shall test this interlock system annually (unless the equipment is not used during that period).

## Order of Approval for NC No. 9295

7. Pliant shall not operate the presses unless the ductwork from the presses to the oxidizers has no visible gaps. Pliant shall inspect the ductwork from the presses to the control devices for compliance with this requirement annually (unless the equipment is not used during that period).

8. For capture efficiency monitoring, Pliant shall record:

- The date and time of the inspections or tests;
- The emission unit inspected or tested;
- Who conducted the inspection or test;
- The results of the inspection or test;
- The corrective actions taken (if any);
- The date and the results of any corrective actions taken; and
- Who took the corrective actions.

### Destruction Efficiency

9. Pliant shall not operate the presses unless the emissions are controlled by an oxidizer with a destruction efficiency of at least 97% (95% for the Kidder and Soloflex presses controlled by the Smith/Anguil oxidizer) or an outlet VOC concentration less than or equal to 20 ppm, as determined by EPA Method 308 (with or without adsorbent tubes).

10. Pliant shall conduct source tests to verify compliance with Condition 9 of this Order at least once every five years (unless the equipment is not used during that period).

11. Pliant shall not operate the presses unless the oxidizer catalyst inlet temperatures are continuously monitored. Pliant shall calibrate the temperature monitoring system to within an accuracy of +/- 20 degrees F (or replace it) annually (unless the equipment is not used during that period).

12. Pliant shall not operate the presses unless the oxidizer catalyst inlet temperature controller setting is at or above the controller setting during the most recent source test that demonstrated compliance with the destruction efficiency requirement. Pliant shall not operate the presses unless they are electronically interlocked with the oxidizers to prevent their operation whenever the catalyst inlet temperature controller setting is less than the source test demonstration value. Pliant shall test these interlocks within 60 days of connecting presses to an oxidizer.

13. Pliant shall not operate the presses unless each known problem that could adversely affect the ability of the oxidizers to meet their required destruction efficiency is corrected in accordance with the manufacturer's recommendations. Pliant shall inspect the interior of the oxidizers for channeling, settling of the beds, physical damage, and proper burner operation annually and shall inspect the exterior of the oxidizers for damage quarterly (unless the equipment is not used during that period).

14. Pliant shall not operate the presses unless either the oxidizer catalyst is cleaned or replaced in accordance with the catalyst manufacturer's recommendations or a source test is conducted to verify compliance with Condition 9 of this Order

## Order of Approval for NC No. 9295

MAY 12 2009

within 90 days of receipt of these recommendations. Pliant shall send samples of the catalyst from each oxidizer to the manufacturer for activity analyses (relative to fresh catalyst) semiannually (unless the equipment is not used during that period).

15. Pliant shall continuously record the catalyst inlet temperatures whenever the oxidizers are in operation. For other destruction efficiency monitoring, Pliant shall record:

- The date and time of the inspections, tests or sampling;
- The emission unit inspected, tested or sampled;
- Who conducted the inspection, test or sampling;
- If applicable, the analytical techniques or methods used;
- The results of the inspection, test or sampling;
- The corrective actions taken (if any);
- The date and the results of any corrective actions taken; and
- Who took the corrective actions.

### VOC and HAP Emissions

16. Pliant shall not allow VOC emissions from the facility to exceed 249 tons during any consecutive 12-month period.

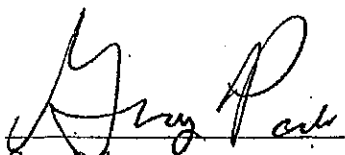
17. Pliant shall record the amount of ink (or VOC in the ink) and solvent used at the facility on a monthly basis. Pliant shall calculate and record the monthly and the rolling 12-month total VOC emissions within 30 days of the end of each month, based on these records and the most recent source tests of the oxidizers.

18. Pliant shall notify the Agency in writing within 30 days after the end of each 12-month period, if VOC emissions during that period exceeded 249 tons.

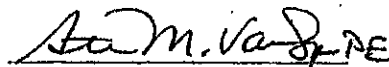
19. This Order of Approval No. 9295 cancels and supersedes Order of Approval Nos. 8447 (dated 4/5/01), 7541 (dated 8/12/98), 7465 (dated 6/2/98), 7441 (dated 5/13/98), and 6119 (dated 7/7/95).

### APPEAL RIGHTS

Pursuant to Puget Sound Clean Air Agency's Regulation I, Section 3.17 and RCW 43.21B.310, this Order may be appealed to the Pollution Control Hearings Board (PCHB). To appeal to the PCHB, a written notice of appeal must be filed with the PCHB and a copy served upon Puget Sound Clean Air Agency within 30 days of the date the applicant receives this Order.



Gerry Pade  
Reviewing Engineer



Steven Van Slyke  
Supervising Engineer

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# Puget Sound Clean Air Agency

Notice of  
Construction No. **10246**

Registration No. **28777**

Date

**JAN 20 2011**

## HEREBY ISSUES AN ORDER OF APPROVAL TO CONSTRUCT, INSTALL, OR ESTABLISH

One (1) 50,000 scfm Ship & Shore Environmental, Inc. Regenerative Thermal Oxidizer (RTO), fired on natural gas, which will control one (1) new and five (5) existing flexographic printing presses. The new W&H Miraflex press is rated at 1,650 ft/min, and the existing presses are: #203 (PCMC Vision), #206 (W&H Stellaflex), #207 (W&H Olympia), #208 (W&H Astraflex), and #210 (PCMC Infinity).

### APPLICANT

**Curt Howard Plant Mgr  
Berry Plastics Corporation  
8039 S 192nd St  
Kent, WA 98032**

### OWNER

**Berry Plastics Corporation  
8039 S 192nd St  
Kent, WA 98032**

### INSTALLATION ADDRESS

**Berry Plastics Corporation, 8039 S 192nd St, Kent, WA, 98032**

### THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

1. Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Clean Air Agency to the applicant to install or establish the equipment, device or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of the Puget Sound Clean Air Agency.
2. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.
3. The W&H Miraflex press shall vent all exhaust gases to the Ship & Shore Regenerative Thermal Oxidizer (RTO), except as allowed under Condition 15. The printing area and ink dispensing area of the W&H press will be located within permanent total enclosures as determined by EPA Method 204.
4. Berry Plastics shall conduct a source test to verify compliance with Condition 3 of this Order within 60 days after initial startup of the W&H Miraflex press. If reconfiguration occurs on any of the ductwork between the exhaust of the W&H Miraflex press and the inlet to the RTO, a source test shall verify compliance with Condition 3 within 60 days of completion of the ductwork reconfiguration. A smoke tube test shall be conducted within 24 hours of completing any ductwork reconfiguration to verify capture. Berry Plastics shall confirm that the capture system is a permanent total enclosure by demonstrating that it meets the requirements of section 6 of Method 204 of 40 CFR part 51, appendix M, and that all exhaust gases from the enclosure are delivered to the RTO. No other presses shall be operated during the W&H Miraflex capture efficiency test. Reference method testing shall be done according to Puget Sound Clean Air Agency (PSCAA) Regulation I, Section 3.07.
5. Berry Plastics shall not operate the existing presses: #203 (PCMC Vision), #206 (W&H Stellaflex), #207 (W&H Olympia), #208 (W&H Astraflex), and #210 (PCMC Infinity), unless at least 90% of the emissions from each press are captured and ducted to the RTO, except as allowed under Condition 15. The capture efficiency shall be determined by EPA Method 308 or by another test method as approved by PSCAA.

## Order of Approval for NC No. 10246

JAN 20 2011

6. Berry Plastics shall conduct source tests to verify compliance with Condition 5 of this Order within 60 days of connecting any existing press to the RTO. If reconfiguration occurs on any of the ductwork between the exhaust of each existing press and the inlet to the RTO, a source test shall verify compliance with Condition 5 within 60 days of completion of the ductwork reconfiguration. A smoke tube test shall be conducted within 24 hours of completing any ductwork reconfiguration to verify capture. Reference method testing shall be done according to PSCAA Regulation I, Section 3.07. Berry Plastics shall also use smoke tubes to verify compliance with this requirement within 24 hours after performing any maintenance or adjustments that could adversely affect the capture efficiency.

7. Berry Plastics shall make a record of the date any ductwork reconfiguration is completed, and notify the Agency prior to any reference method compliance test in accordance with PSCAA Regulation I, Section 3.07(b).

8. For the Miraflex W&H Press, all solvent containers shall be kept closed except when filling, draining or conducting cleaning operations. Keep used, solvent-laden shop towels in closed containers, and convey cleaning materials from one location to another in closed containers. At least once per calendar quarter, inspect the Miraflex W&H Press area to see if:

- i) all solvent containers shall be kept closed (except when filling, draining, or conducting cleaning operations), and
- ii) if used, solvent-laden shop towels are in closed containers, and
- iii) if cleaning materials are being conveyed from one location to another in closed containers.

If problems with the above are identified, correct them within 24 hours.

9. Berry Plastics shall not operate the presses unless the ductwork from the presses to the RTO and the Dec-E-Tec 20,000 has no visible gaps. Berry Plastics shall inspect the ductwork from the presses to both the RTO and the DEC-E-Tec 20,000 for compliance with this requirement annually.

10. Berry Plastics shall not operate the presses unless the emissions are controlled by the RTO, except as allowed under Condition 15, with a destruction efficiency of at least 99.0% or an outlet VOC concentration less than or equal to 10 ppmv, as determined by EPA Method 25A (40 CFR 60, Appendix A).

11. Berry Plastics shall conduct a source test to verify compliance with Condition 10 of this Order within 60 days after initial startup, and then at least once every five years thereafter. Testing shall be done according to PSCAA Regulation I, Section 3.07.

12. At all times when the presses are being vented to the RTO, the presses shall not be operated unless the RTO combustion chamber operating temperature is at or above the temperature during the most recent source test required by Condition 11. The presses shall be electronically interlocked with the RTO to prevent their operation whenever the RTO combustion chamber temperature is less than the temperature during the most recent source test.

13. The RTO shall be equipped with thermocouples to measure the combustion chamber temperature with an accuracy of +/- 10 °F, and with continuous recorders to log the temperature.

14. The RTO combustion chamber thermocouples shall be checked for calibration or replaced annually if not calibrated.

15. If a situation arises where the RTO is non-operable, the flexographic presses may be controlled by the backup Dec-E-Tec 20,000 catalytic oxidizer for up to 336 hours per calendar year. Additional operating hours may be allowable if approved by PSCAA.

## Order of Approval for NC No. 10246

JAN 20 2011

16. For the backup Dec-E-Tec 20,000 catalytic oxidizer, the facility must ensure that the equipment is in good working order and that the catalyst activity analysis still meets the manufacturer's recommendations. The following maintenance shall be conducted:

i. Once per calendar year, inspect the interior of the oxidizer for channeling, settling of the beds, physical damage and proper burner operation.

ii. Prior to starting up the Dec-E-Tec 20,000, conduct a visual inspection of all appropriate ductwork to ensure there are no visible gaps.

iii. Prior to controlling any press by the Dec-E-Tec 20,000, perform a smoke tube test on each press that will be controlled by the unit to ensure capture.

iv. The catalyst activity shall be analyzed either every 5 years or after operating the Dec-E-Tec 20,000 for 600 hours, whichever comes first.

17. The number of hours the Dec-E-Tec 20,000 catalytic oxidizer operates must be recorded in any calendar year during which the oxidizer is used.

18. When routing the air exhaust from the presses to the Dec-E-Tec 20,000 catalytic oxidizer, Berry Plastics shall not operate the presses unless the inlet temperature of the catalytic oxidizer is continuously monitored and maintained at 550 oF or greater. A record shall be maintained of the catalytic oxidizer temperature.

19. Berry Plastics shall not allow VOC emissions from the facility to exceed 249 tons during any consecutive 12-month period.

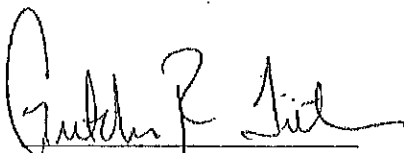
20. Within 30 days of the end of each month, Berry Plastics shall record the amount of ink (or VOC in the ink) and solvent used at the facility during the previous month, and shall calculate and record the monthly and the 12 consecutive month total VOC emissions.

21. Berry Plastics shall notify the Agency in writing within 30 days after the end of each 12-month period, if VOC emissions during that period exceeded 249 tons.

22. This Order of Approval No. 10246 cancels and supersedes Order of Approval No. 9295 issued May 12, 2009.

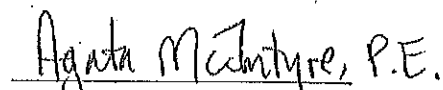
### APPEAL RIGHTS

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Gretchen Jiltner  
Reviewing Engineer

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Agata McIntyre  
Senior Engineer

