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DSE-597-87

ATTACHMENT C

# COMMONWEALTH of VIRGINIA

## State Air Pollution Control Board

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RICHARD L. COOK  
EXECUTIVE DIRECTOR

### CONSENT AGREEMENT AND ORDER

#### ADDRESSING

REYNOLDS METALS COMPANY'S  
RICHMOND FOIL PLANT  
EXISTING FOIL ROLLING MILLS

Registration No. 50534

#### SECTION A: Purpose

This Order establishes a Reasonably Available Control Technology (RACT) standard for the affected aluminum foil rolling mills at the Richmond Foil Plant of the Reynolds Metals Company as required by the 1985 SIP revision for the Richmond, Virginia ozone nonattainment area and defines the RACT standard to be the basis for VOC emissions control compliance for the aluminum foil rolling mills at this plant.

#### SECTION B: References

Unless the context indicates otherwise, the following words and terms have the meanings assigned to them below:

1. "Code" means the Code of Virginia (1950), as amended.
2. "BOARD" or "SAPCB" means the State Air Pollution Control Board, an agency of the Commonwealth of Virginia created pursuant to §10-17.11 of the Code. Particular powers and duties of the Board are referred to in Section C of this document.
3. "Order" means this Consent Agreement and Order.
4. "SAPCB Regulations" means the State Air Pollution Control Board's Regulations for the Control and Abatement of Air Pollution.
5. "Reasonably Available Control Technology" or "RACT" means the low emission limit that a particular source is capable of meeting by application of control technology that is reasonably available considering technological and economic feasibility.

6. "Non-CTG" when referring to a source type, means that the Environmental Protection Agency (EPA) has issued no Control Techniques Guideline and thus has not established RACT for the source type.
7. "Foil Plant" or "Plant" refers to Reynolds Metals Company's, Richmond Foil Plant at 7th and Bainbridge Streets, Richmond, Virginia.
8. "SIP" refers to the Richmond State Implementation Plan approved by the Board.
9. "Affected Facilities" refers to the sixteen (16) existing foil rolling mills at the Foil Plant including Mills No. 202-204 and 206-211 and Mills E-H and J-L.
10. "Reynolds Metals Company" or "Reynolds" refers to Reynolds Metals Company, 6601 West Broad Street, Richmond, Virginia 23230.
11. "Major Source" means a source which emits at least 100 tons per year of Volatile Organic Compound (VOC) emissions.
12. "Foil Rolling Process" means the rolling of nonlaminated, aluminum strip to achieve a gauge reduction resulting in a foil product and does not include metal cleaning operations.
13. "Rolling Lubricant" means the fluid applied to the active rolling surfaces of the mill and the aluminum strip for the purposes of lubrication and cooling in the foil rolling process.

#### SECTION C: Authority

1. Chapter 1.2 of Title 10 of the Code creates the Board and vests in it the authority to supervise and control various aspects of air pollution in the Commonwealth. Among the grants of power to the Board is the authority to promulgate regulations "abating, controlling and prohibiting" air pollution.
2. Pursuant to its authority, the Board has promulgated regulations entitled "Commonwealth of Virginia, State Air Pollution Control Board, Regulations for the Control and Abatement of Air Pollution." The "SAPCB Regulations" first took effect March 17, 1972, with subsequent amendments, the most recent of which became effective October 1, 1986.
3. Pursuant to §§10-17.18(d) and 10-17.18:1, the Board has the authority to issue orders to diminish or abate the causes of air pollution and to enforce its rules and regulations. Orders of the Board are enforceable pursuant to §10-17.23 of the Code.

4. The Executive Director is the executive officer of the Board. Under Code §10-17.14, the Executive Director having been duly delegated with the requisite authority is authorized to supervise, administer and enforce the provisions of Chapter 1.2 of Title 10 of the Code, as well as the rules, regulations, and orders of the Board. Additionally, the Executive Director shall have such powers as are conferred upon him by the Board. The SAPCB Regulations, Appendix F, contain the Delegation of Authority from the Board to the Executive Director. In section II (A) through (J) of Appendix F the Executive Director is given the authority to act to abate or control air pollution, approve consent agreements and consent orders, and perform other duties as prescribed by law or regulation and, as required, to carry out the policies and directives of the Board.

SECTION D: Findings

1. On October 7, 1985 the Board approved a SIP revision which included a commitment to establish emission standards requiring RACT for all major, non-CTG sources of volatile organic compounds (VOC) by December 31, 1987 in order to diminish or abate the causes of air pollution, especially ozone.
2. The Foil Plant was determined by the Board to be a major, non-CTG VOC source in the Richmond area.
3. On February 21, 1986, the Board notified Reynolds Metals Company that the Board would determine RACT for VOC emissions from Reynolds' foil processing operations.
4. On March 7, 1986, Reynolds met with the Board to discuss the RACT determination for the Foil Plant. Reynolds has promptly complied with all subsequent Board information requests.
5. On May 28, 1987, the Board presented Reynolds a RACT determination for the affected facilities at the Foil Plant which defined the use of a normal paraffin lubricant on the affected facilities as RACT.
6. On August 6, 1987, the Board supplied Reynolds with EPA comments on the Board's RACT determination for aluminum foil processing at the Foil Plant.
7. On August 20, 1987, Reynolds supplied to the Board a technical document in support of the State's effort to establish RACT for rolling mill operations at the Foil Plant.
8. The Board recognizes that Reynolds has put forth a substantial effort prior to the date of this Order to research and develop techniques to allow the use of a normal paraffin lubricant on the affected facilities.

9. The Board finds that the requirements of the Order constitute RACT for the affected facilities.

SECTION E: Agreement and Order

Accordingly, the Board orders and Reynolds Metals Company agrees that:

1. Volatile organic compound emissions from the affected facilities at the Plant shall be controlled and reduced as outlined in this Order.
2. RACT for the control of VOC emissions from the affected facilities shall be defined as the use of a normal paraffin lubricant containing a minimum of 88 percent saturated aliphatic compounds of carbon range C12 and above.
3. Beginning no later than May 1, 1988, the affected facilities shall comply with RACT as defined in this Order.
4. RACT compliance for the affected facilities shall be demonstrated by an analysis complying with the specifications of Item 2, Section E of a grab lubricant sample from any mill in operation at the time of sampling. Gas chromatography is an acceptable procedure by which the analysis may be performed. Grab samples may be taken and analyzed by the Board or EPA.
5. A copy of a gas chromatograph analysis of the normal paraffin lubricant is attached.
6. Reynolds Metals Company shall also maintain records to demonstrate compliance with Item 3, Section E of this Order and the records shall be made available to the Board Region V office upon request. Reynolds shall purchase only normal paraffin lubricants for use as a rolling lubricant as defined by this order. Reynolds shall maintain records of the lubricant purchases. Reynolds shall perform analyses of the as-applied lubricant monthly and maintain records.
7. The temperature of the normal paraffin lubricant for the affected facilities shall be controlled and regulated to a maximum of 150°F in the lubricant spray manifold at each mill and records kept and made available upon request to the Board Region V office to demonstrate compliance with this requirement. Reynolds shall measure and record the lubricant temperature at each mill, as a minimum, daily.
8. Reynolds Metals Company may continue to do research and development on the affected facilities with the goal of potentially reducing VOC emissions.

9. The use of innovative control technology, different from that specified in Item 2, Section E of this Order is allowed for experimentation and trial operation as long as emissions do not increase. Reynolds Metals Company shall inform the Director of Region V prior to full-scale mill trials of any innovative control technology.
10. The records required in Items 6 and 7 shall be maintained for a minimum of two years.
11. The Board may modify, rewrite, or amend this order for good cause shown by Reynolds or on its own motion after notice and an opportunity for a hearing in accordance with the requirements for a SIP revision.
12. Except as to the jurisdiction of the Board and the validity of this order the actions of Reynolds pursuant to this Order do not constitute an admission by Reynolds of any violation of any law or a waiver by Reynolds of any right to present any evidence in argument that it is in compliance with the requirements of any law or regulation in any case, cause, controversy or court of law or equity.
13. So long as this Order remains in effect, Reynolds Metals Company waives the right to any public hearing pursuant to Code Section 10-17.18:1 and to judicial review of any issue of fact or law contained herein. Nothing herein, however, shall be construed as a waiver of the right to a hearing or to judicial review of any action taken by the Board to enforce or modify this Order.
14. Failure by Reynolds Metals Company to comply with any of the terms of this Order shall constitute a violation of an Order of the Board. Nothing herein shall waive the initiation of appropriate enforcement actions or the issuance of additional 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.
15. Reynolds Metals Company declares it has received fair and due process under the Administrative Process Act, Title 9, Chapter 1.1:1, Section 9-16.14, as affected by Section 10-17.18:1.
16. This Order shall become effective upon execution by both parties and shall continue in effect as long as any of the affected facilities exists and is in operation.

The foregoing Consent Agreement and Order has been executed on behalf of the STATE AIR POLLUTION CONTROL BOARD of the COMMONWEALTH OF VIRGINIA and on behalf of REYNOLDS METALS COMPANY, each by its duly authorized representatives, or self, on the dates indicated below.

STATE AIR POLLUTION CONTROL BOARD  
OF THE COMMONWEALTH OF VIRGINIA

December 18, 1987  
(date)

By: Richard L. Cook  
Richard L. Cook  
Executive Director

REYNOLDS METALS COMPANY

December 21, 1987  
(date)

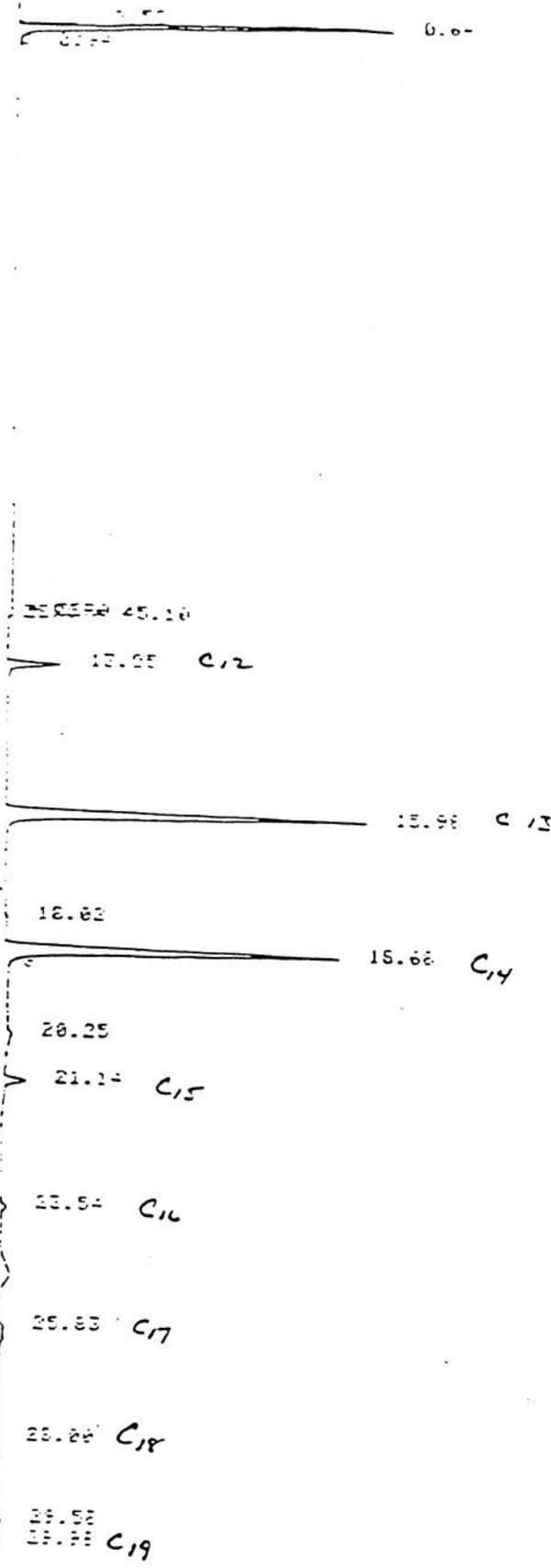
By: Rodney E. Hanneuman  
R. E. Hanneuman  
Vice-President Corporate  
Quality Assurance and  
Technical Operations *J.E.M.*

STANDARD SENSITIVITY GAS CHROMATOGRAM OF NORPAK 15 BASED K MILL SAMPLE

106

Light Olefins

Heavy End Components



STANDARD SENSITIVITY GAS CHROMATOGRAM OF KEROSENE/MSO K MILL SAMPLE

