

**Minutes
Public Hearing
of the
Louisville Metro Air Pollution Control Board
March 18, 2015**

A public hearing of the Louisville Metro Air Pollution Control Board was called to order on March 18, 2015, at 10:00 a.m. in the Board Room of the Louisville Metro Air Pollution Control District, 850 Barret Avenue, Louisville, Kentucky by the Chairman, Dr. Robert Powell.

General Statement, Rules and Purpose

The Chairman read the opening announcements, rules and purpose of the public hearing, which was to review the Agreed Board Order with Reynolds Consumer Products LLC.

1. Agreed Board Order with Reynolds Consumer Products LLC

Mr. Matt King, Compliance and Enforcement Manager, asked the Board to consider and adopt a proposed Agreed Board Order that alleged that Reynolds Consumer Products LLC exceeded an annual VOC limit in 2012 and a daily VOC limit in 2013.

Reynolds manufactures aluminum foil at its facility located in Jefferson County pursuant to District Title V permit 158-97-TV (R1). In September of 2012, the company notified the District that it was close to its annual limit of 1,298 tons of VOCs for the rolling mills and ovens, and was temporarily ceasing production to avoid exceeding the limit. At that time there was uncertainty regarding the company's emissions, and the Board approved an Order that stated that if it was determined that the company exceeded its annual VOC limit, the company would submit a Prevention of Significant Deterioration or "PSD" application.

In February 2013, the company notified the District that it had taken corrective action and that its VOC emissions for 2012 were below the 1,298 ton annual limit, but the District did not agree with Reynolds' method for calculating the emissions. Reynolds' method did not include in-process storage volume for three storage tanks that had been used the previous year in its calculations, nor did it include other in-process storage volume held in all of its mills. Using in-process storage for the three tanks, the District considered the company to be 58 tons over its annual permit limit.

Since that time, however, Reynolds has demonstrated that it should be able to remain within its limits in the future, and that a PSD application is not required at this time. To further reduce emissions, the company has agreed to install mist control improvements on Mills 1 and 5, which is estimated to reduce almost 100 tons of VOCs per year. The company has also submitted an Operation and Maintenance Plan, which includes performing monthly material balance calculations using estimates of change in all in-process storage volume.

In a separate event, Reynolds reported that sometime during July 2013, a mill scrubber operator found a valve in a three-quarter open position that was allowing wash oil to bypass the scrubber. The company discovered that during a planned shutdown of the scrubber, the operator failed to fully return the valve to the closed position before allowing the mill to restart. Reynolds reported that the daily VOC emission rate between July 6, 2013 and July 31, 2013 was 2,388 pounds VOCs per day, exceeding the permit limit of 714.48 pounds VOCs per day. The excess emissions were estimated to be 24.26 tons.

The District assessed, and Reynolds agreed to, an administrative penalty of \$124,500.

Statements

Mr. Carl Horneman of Wyatt, Tarrant and Combs introduced Mr. Vince Pinnick, Environmental Engineer and Mr. Scott Russ, Plant Manager, of Reynolds Consumer Products LLC. Mr. Horneman stated that the Agreed Board Order was the result of more than two years of work between Reynolds and the District, and asked that the Board approve the Order. Since the issue first arose, Reynolds has worked diligently to better measure and reduce VOC emissions and stated that Reynolds would like to acknowledge the cooperation of District staff in resolving this issue.

Adjourn

The public hearing adjourned at 10:07 a.m.

Robert W. Powell, M.D.
Chairman

Rachael Hamilton
Secretary-Treasurer