

BEFORE THE NORTH CAROLINA
ENVIRONMENTAL MANAGEMENT COMMISSION

STATE OF NORTH CAROLINA)	
)	
COUNTY OF GUILFORD)	
)	
IN THE MATTER OF:)	SPECIAL ORDER BY CONSENT
St. JOHNS PACKAGING USA, LLC)	
)	SOC 2025 - _____
)	
GREENSBORO, GUILFORD COUNTY)	
NORTH CAROLINA)	
[FACILITY ID NUMBER 4100823])	

This SPECIAL ORDER BY CONSENT (hereinafter referred to as the “ORDER”) is made and entered into pursuant to North Carolina General Statute 143-215.110 by and between St. JOHNS PACKAGING USA, LLC (hereafter referred to as the “COMPANY”) and the ENVIRONMENTAL MANAGEMENT COMMISSION, an agency of the State of North Carolina (hereinafter referred to as the “COMMISSION”).

WITNESSETH:

- I. The COMMISSION and the COMPANY do hereby stipulate and agree to the following:
 - A. The COMPANY operates EMISSION SOURCES AND CONTROL DEVICES (hereafter referred to as the “FACILITY”) located at 2619 PHOENIX DRIVE in GREENSBORO, GUILFORD COUNTY, North Carolina. The FACILITY currently operates under Title V Air Quality Permit No. 02221T21, issued on December 19, 2023.
 - B. “Affected sources” at the FACILITY include the sources listed in the current Title V Air Quality Permit No. 02221T21, issued on December 19, 2023, and incorporated herein by reference.
 - C. The FACILITY is subject to both State and Federal air quality regulations which are incorporated into Air Quality Permit No. 02221T21. The permitted emission sources and associated air pollution control devices and appurtenances are subject to emissions and operational standards as well as monitoring, recordkeeping, and reporting requirements.
 - D. Air Quality Permit No. 02221T21 has an expiration date of NOVEMBER 30, 2028.

Special Order By Consent
St. JOHNS PACKAGING USA, LLC

- E. SECTION 2.3 A. 1. a. of the permit specifies the Actual Plantwide Applicability Limitations (PAL) of 407 tons per year of Volatile Organic Compounds (VOC) emissions per rolling 12-month period, with an effective date for this PAL of April 8, 2015, and an expiration date for this PAL of March 31, 2025.
- F. SECTION 2.3 A. 1. b. of the permit states that if the Permittee applies to renew the PAL permit in accordance with 40 CFR 51.165(f)(10) before the end of the PAL effective period above, then the PAL permit shall not expire at the end of the PAL since effective period. It shall remain in effect until a revised PAL permit is issued by the Division of Air Quality (DAQ).
- G. Section 2.3 A. 1.c. of the permit states that once the PAL permit expires, the Permittee is subject to the requirements in 40 CFR 51.165(f)(9). Upon PAL permit expiration, the DAQ shall decide whether and how the PAL allowable emissions will be distributed and issue a revised permit incorporating allowable limits for each PAL emissions unit, as the DAQ determines is appropriate. The DAQ will retain the ultimate discretion to decide whether and how the allowable emissions will be allocated. [40 CFR 51.165(f)(7)(v) and 40 CFR 51.166(w)(7)(v)]
- H. The FACILITY did not submit the PAL renewal application in accordance with 40 CFR 51.165(f)(10). Therefore, the expiration date for the PAL was on March 31, 2025.
- I. The FACILITY in their letter dated March 20, 2025, indicated that PAL limit of 407 tons per year of VOC is not necessary, and the compliance with air quality regulations can be achieved with overall facility wide VOC emissions of less than 250 tons per year.
- J. The FACILITY requests to demonstrate the compliance with the limitation of VOC emissions of less than 250 tons per year set forth in 15A NCAC 02Q .0317, Avoidance Conditions for 15A NCAC 02D .0530 Prevention of Significant Deterioration, and to process the Significant Title V Air Permit Modification Application under the pending Application No. 4100823.25A as a two-step significant modification pursuant to 15A NCAC 02Q .0501(b)(2).
- K. DAQ plans to issue a Notice of Violation / Notice of Recommendation of Enforcement (NOV/NRE) to the COMPANY since the PAL limit expired on March 31, 2025, and the FACILITY will begin operating with the limitation of

Special Order By Consent
St. JOHNS PACKAGING USA, LLC

VOC emissions of less than 250 tons per year set forth in 15A NCAC 02Q .0317 Avoidance Conditions instead of PAL limit of 407 tons per year.

- L. DAQ has determined that, due to the COMPANY's commitment to maintain compliance with all State and Federal air quality regulations, this ORDER is a necessary and appropriate mechanism to allow the FACILITY to operate and demonstrate compliance with the limitation of VOC emissions of less than 250 tons per year set forth in 15A NCAC 02Q .0317 Avoidance Conditions until the Significant Title V Air Permit Modification Application is processed and a new Air Quality Permit is issued.

THEREFORE, the COMMISSION and the COMPANY, desiring to resolve and settle the compliance issues between them, have agreed to enter into this ORDER with the following terms and conditions:

- II. The COMPANY, desiring to operate in a safe and environmentally sound manner during the period of this ORDER and thereafter in accordance with the rules and regulations of the COMMISSION, does hereby agree to adhere to the following conditions:
 - A. The COMPANY shall adhere to a revised limitation of VOC emissions of less than 250 tons per year set forth in 15A NCAC 02Q .0317 Avoidance Conditions instead of PAL limit of 407 tons per year.
 - B. The COMPANY will comply with all terms, conditions, and requirements of Air Quality Permit No. 02221T21 until a new Air Quality Permit is issued. The terms, conditions, and requirements of Air Quality Permit No. 02221T21 are incorporated into this ORDER by reference.
 - C. The COMPANY shall keep records on a monthly basis of the amount of VOC-containing material and the VOC content of each material used in each process.
 - D. The COMPANY shall record and maintain records of the hours of operation of the regenerative thermal oxidizer (RTO) (ID No. CD-1).
 - E. The COMPANY shall maintain the minimum 3-hour block average chamber temperature of the RTO at no less than 1,450 degrees F when the RTO is in operation to control VOC emissions from the controlled flexographic printing presses (ID Nos. ES-WH13, ES-WH12, and ES-MI-14). The chamber temperature

Special Order By Consent
St. JOHNS PACKAGING USA, LLC

of the RTO shall be monitored continuously, and the COMPANY shall record the 3-hour block average temperatures in a logbook (written or electronic format). These records shall be made available to DAQ personnel upon request.

- F. To ensure proper operation of the RTO, the COMPANY shall perform periodic inspections and maintenance as recommended by the manufacturer, as applicable. As a minimum, the inspection and maintenance program shall include:
1. Monthly external inspection of the structural integrity of the RTO;
 2. Annual (for each 12-month period following the initial inspection) internal inspection of the RTO noting the structural integrity, including inspection of the valves for leakage; and
 3. Annual (for each 12-month period following the initial inspection) inspection of the burner.
- G. The results of each inspection and maintenance for the RTO shall be recorded and maintained in a logbook (written or electronic format) onsite and made available to DAQ personnel upon request. The logbook shall record the following:
1. The date and time of each recorded action;
 2. The results of each inspection; and
 3. The results of a maintenance performed on the RTO.
- H. The COMPANY shall calculate and record the VOC emissions from the uncontrolled flexographic printing presses (ID Nos. ES-MA20, ES-WH11, and ES-U10) on a monthly basis. VOC emissions shall be determined by multiplying the total amount of VOC containing material consumed during the month by the VOC content of the material from each press in operation.
- I. The COMPANY shall calculate and record the VOC emissions from the controlled flexographic printing presses (ID Nos. ES-WH13, ES-WH12, and ES-MI-14) on a monthly basis. VOC emissions shall be determined by the following:
1. When the RTO (ID No. CD-1) is in operation with at least chamber temperature of 1,450 degrees F, the VOC emissions shall be calculated by multiplying the total amount of each type of VOC containing material consumed during the period in which the RTO is operational by the VOC content of the material and multiplying by 0.14.

Special Order By Consent
St. JOHNS PACKAGING USA, LLC

2. When the RTO is operated at a temperature below the minimum chamber temperature of 1,450 degrees F or if the temperature is not monitored, the RTO shall be deemed not in operation. For each period that the RTO is deemed not in operation, VOC emissions from each press (ID Nos. ES-WH13, ES-WH12, and ES-MI-14) shall be determined by multiplying the total amount of VOC containing material consumed during this period by the VOC content of the material.
- J. The COMPANY shall calculate and record the VOC emissions from waste inks and solvents used in the facility on a monthly basis. VOC emissions shall be determined by the following equation:
1. Total VOC emissions from waste inks and solvents (tons/month) =
$$[(\text{Solvents (lb/month)} + 60\% * \text{Inks (lb/month)} - 5\% * \text{Consolidated Waste (lb/month)}) / 2,000 \text{ lb/ton}]$$
- K. The COMPANY shall calculate and record the VOC emissions from natural gas combustion in the RTO and natural gas-fired bake ovens (ID Nos. CD-1, ES-WH13, ES-WH12, ES-MI-14, ES-WH11, and ES-U10) on a monthly basis. VOC emissions shall be determined by the following equation:
1. Total VOC emissions from natural gas combustion (tons/month) =
$$[(7.0 \text{ lb}/10^6 \text{ scf}) * (C_1 \text{ scf/month}) + (5.5 \text{ lb}/10^6 \text{ scf}) * (C_2 \text{ scf/month})] / 2,000 \text{ lb/ton}$$
 where: C_1 = natural gas usage in the RTO (ID No. CD-1), in scf per month and C_2 = natural gas usage in the natural gas-fired bake ovens, in scf per month.
- L. The COMPANY shall use an estimate of 1 ton of VOC emissions per rolling 12-month period for the following sources, combined:
1. Propyl Alcohol Aboveground Storage Tank (ID No. I2);
 2. Recycled Solvent Storage Tank (ID No. I4);
 3. Ink Mixing, Ink Storage (ID No. I7); and
 4. CleanPlanet Distillation Still (ID No. I8).
- M. The COMPANY shall calculate and record the monthly and consecutive 12-month rolling facility wide VOC emissions on a monthly basis. Monthly facility wide VOC emissions shall be calculated by summing the monthly VOC emissions for each source or group of sources according to the procedures given in Sections II.H

Special Order By Consent
St. JOHNS PACKAGING USA, LLC

through II. L above. Consecutive 12-month rolling facility wide VOC emissions, in tons, shall be calculated each month by summing the monthly facility wide VOC emissions for the previous 12-month period.

- III. The COMPANY shall pay the following penalties:
- A. The COMPANY agrees to pay DAQ a civil penalty in the amount of \$4000.00. This amount shall be paid within 30 days of the effective date of this ORDER.
 - B. In the event that the COMPANY fails to comply with Paragraph II of this ORDER, the COMPANY shall be subject to appropriate enforcement action pursuant to N.C.G.S. § 143-215.114A.

The COMPANY shall notify DAQ in writing of any violation of Paragraph II of this ORDER within ten (10) days of discovering such violation.

- IV. In addition to any enforcement actions initiated by DAQ pursuant to Paragraph III, in the event the COMPANY violates this ORDER, the COMPANY may be subject to an injunction action pursuant to N.C.G.S. § 143-215.114C for relief necessary to prevent or abate the violations. Except as indicated in Paragraph I.G and as authorized pursuant to this Paragraph and Paragraph III, the COMPANY shall not be issued any further Notices of Violation or be subject to enforcement action for the violations specified in Paragraph I. Any other violations for which the COMPANY is responsible shall subject the COMPANY to appropriate enforcement action pursuant to N.C.G.S. §§ 143-215.114A, 143-215.114B and 143-215.114C.
- V. The COMPANY agrees to waive any rights it may have to seek judicial review to challenge this ORDER.
- VI. All notices and reports required by this ORDER shall be delivered to:

Regional Air Quality Supervisor
N.C. Dept. of Environmental Quality
450 WEST HANES MILL ROAD, SUITE 300
WINSTON-SALEM, North Carolina 27105

Special Order By Consent
St. JOHNS PACKAGING USA, LLC

All payments required from the COMPANY by this ORDER shall be delivered to:

Enforcement Group – Payments
NCDEQ – DAQ
1641 Mail Service Center
Raleigh, North Carolina 27699-1641

- VII. Final approval and entry into this ORDER are subject to the requirements that the COMMISSION give notice of proposed special orders to the public, and that the public have at least thirty (30) days within which to comment on the ORDER.
- VIII. Should any provision of this ORDER be declared by a court of competent jurisdiction to be inconsistent with Federal or State law and therefore unenforceable, the remaining provisions hereof shall remain in full force and effect.
- IX. The Parties may jointly stipulate and agree to modify this ORDER at any time subject to the requirements of 15A NCAC 02D .2203. Any modifications of this ORDER must be agreed to in writing signed by both parties.
- X. Except as otherwise set forth herein, this ORDER is not and shall not be interpreted to be a permit or modification of an existing permit under Federal, State or local law, and shall not be construed to waive or relieve the COMPANY of its obligations to comply in the future with any permit.
- XI. This ORDER is effective on execution by the COMMISSION and shall expire when DAQ takes final action on the FACILITY's permit application.

Special Order By Consent
St. JOHNS PACKAGING USA, LLC

ATTESTED:

St. JOHNS PACKAGING USA, LLC

BY:



Craig Bonde
Packaging Innovation Manager

DATE: APRIL 23, 2025

APPROVED AND ACCEPTED:

BY:

For the Environmental Management Commission

DATE: _____