

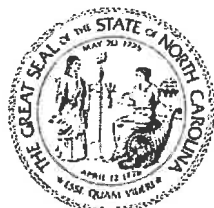
DAQ CIVIL PENALTY ASSESSMENT CASE SUMMARY

Case Number: DAQ 2019-056 Region: Fayetteville Regional Office County: Moore

Violator: Reliance Packaging

Case Summary

- Reliance Packaging produces various plastic bag products for items such as gardening mulch.
- On August 17, 2018, Reliance Packaging was issued Air Quality Permit 10586R00, with an expiration date of July 31, 2026.
- Through compliance inspections performing on March 13, 2019, and May 23, 2019, at the facility by FRO along with additional information provided by the facility to FRO through various communications, it was determined that Reliance Packaging was in violation of the followings:
 1. 15A NCAC 02D .0611 – Thermal Oxidizer Requirements for failing to operate, monitor, and maintain records for the thermal oxidizer
 2. General Condition B.6 - G.S. 143-215.108(c)(1) Proper Operation for failing to operate the thermal oxidizer at all times the presses were in operation
 3. G.S. 143-215.108 for installing the new printing press without a permit
- A Notice of Violation/Notice of Recommendation for Enforcement (NOV/NRE) dated April 17, 2019, and June 11, 2019, were sent to Reliance Packaging for the above violations. A written response to both NOV/NRE was received.
- On December 20, 2019, Michael A. Abraczinskas, Director of DAQ, issued a civil penalty assessment in the amount of \$9229.00 plus \$845.00 investigative costs, for the above noted violation. This certified letter was delivered on January 02, 2020.
- The DAQ received a request for remission from Reliance Packaging dated January 23, 2020. The request included a justification for remission request and a waiver of rights to an administrative hearing and stipulation of facts.
- On April 22, 2020, Michael A. Abraczinskas, Director of DAQ, reviewed the information contained in the remission and found no grounds to modify the assessment.
- The DAQ has received a request for an oral presentation to the EMC from the violator.



NORTH CAROLINA
Environmental Quality

ROY COOPER

Governor

MICHAEL S. REGAN

Secretary

MICHAEL ABRACZINSKAS

Director

3 August 2018

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Satish Sharma, President
Reliance Packaging
175 Anderson Street
Aberdeen, North Carolina 28315

SUBJECT: Notice of Violation - N.C. General Statute 143-215.108
Construction of New Air Pollution Sources or Air Cleaning Devices Prior to
Obtaining an Air Quality Permit
Reliance Packaging
Aberdeen, North Carolina, Moore County 06/6300110

Dear Mr. Sharma:

On 2 August 2018, the Division of Air Quality, Fayetteville Regional Office, received your application for an air quality permit for your printing operation located in Aberdeen, Moore County. Greg Reeves of this office contacted you by phone to discuss the permit application. During that conversation, you indicated that the printing presses have already been installed and construction of the control devices is in progress and almost complete.

North Carolina General Statute 143-215.108 requires that construction of new air pollution sources or air cleaning devices, or modifications to the sources or air cleaning devices must be covered under a permit issued by the Division of Air Quality prior to construction. Failure to do so is a violation of G.S. 143-215.108 and may subject the Permittee to civil or criminal penalties as described in G.S. 143-215.114A and 143-215.114B. **Construction of the printing presses and control devices prior to obtaining an air quality permit constitutes a violation of G.S. 143-215.108.**

As stated in the "subject" above, this letter represents a Notice of Violation for the cited violation. The above violation and any future violation of an air quality regulation are subject to the assessment of civil penalties per North Carolina General Statute 143-215.114A.



Since DAQ has received your air quality permit application for this equipment, no further action is required at this time. However, be advised that operation of this equipment is not authorized prior to the issuance of the air quality permit. In addition, if there are plans to install other equipment in the future, please call the Fayetteville Regional Office air permitting staff prior to construction to discuss whether an air quality permit is required.

The Fayetteville Regional Office, Division of Air Quality appreciates your prompt attention to this matter. If you have any questions regarding the cited violation, please contact Gregory Reeves, Permits Coordinator, or me at (910) 433-3300.

Sincerely,



Heather S. Carter
Regional Air Quality Supervisor
NCDEQ, Division of Air Quality

HSC\gwr

cc: FRO Facility Files



ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL A. ABRACZINSKAS
Director



NORTH CAROLINA
Environmental Quality

22 March 2019

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Satish Sharma, President
Reliance Packaging
175 Anderson Street
Aberdeen, NC 28315

SUBJECT: Compliance Additional Information Request
Reliance Packaging Permit No. 10586/R00
Aberdeen, NC, Moore County Facility ID: 6300110
Fee Class: Synthetic Minor

Dear Mr. Sharma:

On 13 March 2019, Stephen Allen and Abdul Kadir, both with the Fayetteville Regional Office of the Division of Air Quality (FRO DAQ), met with Tom Prottis, General Manager, and John Vandernoord, Maintenance Manager, to conduct a full air quality compliance inspection of Reliance Packaging, in Aberdeen, Moore County, NC. During this inspection, Mr. Prottis and Mr. Vandernoord were unable to provide any documentation that the temperature in the regenerative thermal oxidizer (ID No. CD1) had been maintained according to your current air permit Specific Condition and Limitation A.8, 15A NCAC 02D .0611 "Thermal Oxidizer Requirements," while the printing presses (ID Nos. ES-1 and ES-2) were operating. Therefore, additional information is needed to determine your compliance status with respect to your current air quality permit.

Please submit the following information to this office as soon as possible, but no later than 5 April 2019:

- 1) The printing operations start date on this site, including printing operations in other buildings,
- 2) Hours of printing press operation by month from January 2018 through February 2019,
- 3) Any documentation of regenerative thermal oxidizer operation at the minimum 3-hr average operating temperature of 1500°F (815°C) while printing presses were operating from January 2018 through February 2019,
- 4) Monthly product (ink, coating, solvent, etc) usage from January 2018 through February 2019,
- 5) Monthly and 12-month rolling total VOC emissions from January 2018 through February 2019.



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H. 15A NCAC 2D .1806 – CONTROL AND PROHIBITION OF ODOROUS EMISSIONS

– The facility shall not contribute to objectionable odors beyond the facility’s property boundary.
APPEARED IN COMPLIANCE – Mr. Prots stated that no odor complaints have been received by the facility, and there have been no odor complaints received by DAQ. We detected no objectionable odors during the inspection.

I. 15A NCAC 02D .0315 – LIMITATION TO AVOID 15A NCAC 2Q .0501 – The facility shall maintain temperatures and perform periodic inspection and maintenance as required by the specific condition and limitation 15 NCAC 2D .0611 – Thermal Oxidizer Requirements.

VIOLATION NOTED – During the inspection, we noted the following:

Operation Restrictions – The facility did not maintain temperatures as required by the permit condition “Thermal Oxidizer Requirements”. During the inspection the thermal oxidizer was not operating while one of the press units was in operation. Mr. Prots stated they don’t always run the RTO when they are only running one press.

Recordkeeping – Mr. Prots and Mr. Van Der Noord were not able to provide a record for continuously monitoring the operating temperature on the thermal oxidizer and were unaware that this was a requirement in the permit. Additionally, the facility I&M records, as required by the permit condition “Thermal Oxidizer Requirements,” were not available.

J. 15A NCAC 02D .0317 – LIMITATION TO AVOID 15A NCAC 2Q .0530 – Facility wide PM10 and VOC emissions shall both be less than 250 tons per year. The facility complies with this permit condition by complying with the specific condition and limitation 15A NCAC 2D .0315 – Limitation to Avoid 15A NCAC 2Q.0501 (see section 6.K above).

VIOLATION NOTED – During the inspection, the facility was in violation of the permit condition “Limitation to Avoid 15 NCAC 2Q .0501” because the operational and recordkeeping requirements were not met (see section G. and I. above).

K. TOXIC AIR POLLUTANT EMISSIONS LIMITATION REQUIREMENT - Pursuant to 15A NCAC 2Q .0711 – The facility shall be operated and maintained in such a manner that emissions of any listed TAPs from the facility, including fugitive emissions, will not exceed TPERs listed in 15A NCAC 2Q .0711(a).

COMPLIANCE UNDETERMINED – Compliance was determined during the most recent permit review based on operating the source as described in the permit conditions. No changes have been made to operations since that determination. Several violations were noted during the inspection. The facility has been operating their presses without running the thermal oxidizer. FRO DAQ has requested the following information from the facility:

- Production totals from start date of production – through February 2019
- Monthly and 12-month rolling total of VOC emissions without controls
- Total VOC/HAP/TAP emissions without controls
- Documentation of operating regenerative thermal oxidizer at minimum operating temperature of 1500°F (815°C).

Be advised that, without records to document the operation of the regenerative thermal oxidizer concurrent with the operation of the printing presses, the VOC emissions will need to be calculated as uncontrolled.

We appreciate your immediate attention and response to this request for information. If you have any questions regarding the information requested above, please contact Stephen Allen, Environmental Specialist, or me, at (910) 433-3300.

Sincerely,



Heather S. Carter
Regional Supervisor
NCDEQ, Division of Air Quality

HSC/sca

cc: FRO Facility Files



North Carolina Department of Environment and Natural Quality
Payetteville Regional Office 2229 Green Street, Suite 47 Fayetteville, North Carolina 28702-2894
910.433.3300 F 910.433.4677 F

ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL A. ABRACZINSKAS
Director



NORTH CAROLINA
Environmental Quality

17 April 2019

1st NOV - 4/17
nd NOV - 6/11

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Satish Sharma, President
Reliance Packaging
175 Anderson Street
Aberdeen, NC 28315

SUBJECT: Notice of Violation/Notice of Recommendation for Enforcement:
15A NCAC 02D .0611 – Thermal Oxidizer Requirements
15A NCAC 02Q .0315 – Limitation to Avoid 15A NCAC 02Q .0501
15A NCAC 02Q .0317 – Limitation to Avoid 15A NCAC 02Q .0530
General Condition B.6 - G.S. 143-215.108(c)(1) Proper Operation
Reliance Packaging Permit No. 10586/R00
Aberdeen, NC, Moore County Facility ID: 6300110 Fee Class: Synthetic Minor

Dear Mr. Sharma:

On 13 March 2019, Stephen Allen and Abdul Kadir, both with the Fayetteville Regional Office of the Division of Air Quality (FRO DAQ), met with Tom Prots, General Manager, and John Vandernoord, Maintenance Manager, to conduct a full air quality compliance inspection of Reliance Packaging, in Aberdeen, Moore County, NC. On 22 March 2019, this office sent you a Compliance Additional Information Request letter as a follow on to the inspection. On 4 April 2019 we received your response to the information request. Based on observations during the inspections and information provided in your response, the following are documented violations of your air permit:

I. Specific Condition and Limitation A.8: 15A NCAC 02D .0611 – Thermal Oxidizer Requirements & General Condition B.6 - G.S. 143-215.108(c)(1) Proper Operation

Specific Condition and Limitation A.8: 15A NCAC 02D .0611 – Thermal Oxidizer Requirements requires that "... VOC, HAP, and TAP emissions shall be controlled as described in the permitted equipment list." The permitted equipment list states that emissions from the 8 Color Flexographic Printing Press PCMC 7991 (Source ID No. ES-1) and 6 Color Flexographic Printing Press Schiavi//Padane Sirio 146 (Source ID No. ES-2) are controlled by the Natural Gas-fired Regenerative Thermal Oxidizer (RTO). In addition, General Condition B.6, requires that "...In accordance with G.S. 143-215.108(c)(1), the facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified



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by this permit, no emission source may be operated without the concurrent operation of its associated air cleaning device(s) and appurtenances..." In your response to the information request you stated that the presses and the RTO have an "interlock system" that prevents the presses from operating if the RTO is not operating. However, during the inspection one of the presses was observed operating while the RTO was not operating and Mr. Protts also stated, during the inspection, that the RTO is not always operated. **By failing to operate the RTO at all times that the presses were in operation you violated 15A NCAC 02D .0611 and General Condition B.6.**

Specific Condition and Limitation A.8: 15A NCAC 02D .0611 – Thermal Oxidizer Requirements also requires that the Permittee shall: 1) maintain the temperature in the regenerative thermal oxidizer (RTO) at a minimum of 1,500 degrees Fahrenheit, based on a 3-hour rolling average; 2) continuously monitor and record the temperature in the thermal oxidizer while it is operating; and 3) maintain records on-site and in a form that is readily available for expeditious inspection and review. During the inspection, Mr. Protts and Mr. Vandernoord were unable to provide any documentation that the temperature in the RTO had been properly maintained at or above the minimum required while the presses were operating. **By failing to comply with the operating, monitoring, and recordkeeping requirements for the RTO you violated 15A NCAC 02D .0611.**

II. Specific Condition and Limitation A.10: 15A NCAC 02Q .0315 – Limitation to Avoid 15A NCAC 02Q .0501 – Requirement for a Title V Permit

This permit condition requires that Volatile Organic Compound (VOC) emissions be limited to less than 100 tons per consecutive 12-month period. The following restrictions/requirements apply to ensure this limit is not exceeded:

- VOC emissions shall be controlled as described in the permitted equipment list.
- The Permittee shall conduct periodic inspection and maintenance of the thermal oxidizer system per the requirements of the 15A NCAC 02D .0611 "Thermal Oxidizer Requirements" permit condition.
- The Permittee shall maintain the temperature in the thermal oxidizer per the requirements of the 15A NCAC 02D .0611 "Thermal Oxidizer Requirements" permit condition.
- The Permittee shall maintain records of the temperature in the thermal oxidizer per the requirements of the 15A NCAC 02D .0611 "Thermal Oxidizer Requirements" permit condition.

As established in Section I. above, the RTO was not being operated at all times that the presses were operated, the temperature monitoring was not being conducted nor were the records created and maintained. Without valid documentation that the RTO operated when the presses were operating, and especially since the RTO was observed not operating during the inspection while a press was operating, your actual VOC emissions



are to be calculated without any control efficiency applied. Based on the ink and solvent use data you provided in your response to the information request, FRO DAQ calculated your actual VOC emissions, without control, and determined that from March 2018 through February 2019, your facility emitted 108.8 tons of VOCs. **By failing to limit VOC emissions to less than 100 tons per consecutive 12-month period and by failing to comply with the operations restrictions and recordkeeping requirements for the RTO you violated 15A NCAC 02Q .0315 – Limitation to Avoid 15A NCAC 02Q .0501.**

III. Specific Condition and Limitation A.10: 15A NCAC 02Q .0317 – Limitation to Avoid 15A NCAC 02Q .0530 – Prevention of Significant Deterioration

This permit condition states that the Permittee shall comply with the operations restrictions and recordkeeping requirements by complying with the operations restrictions and recordkeeping requirements of the 15A NCAC 02Q .0315 "Synthetic Minor Facilities" permit condition. As established in Section II. above, your facility failed to comply with these requirements. **By failing to meet the operation restrictions and recordkeeping requirements for the 15A NCAC 02Q .0315 permit condition you violated 15A NCAC 02Q .0317 - Limitation to Avoid 15A NCAC 02D .0530.**

As stated in the "subject" above, this letter represents not only a Notice of Violation for the above-cited violations, but puts you on notice that this office is preparing an enforcement report addressing the violations. The above violations and any future violation of an air quality regulation are subject to the assessment of civil penalties per North Carolina General Statute 143-215.114A. This General Statute provides that civil penalties of not more than twenty-five thousand dollars (\$25,000) may be assessed against any person who violates any classification, standard, or limitation established pursuant to General Statute 143-215.107, "Air Quality Standards and Classifications." In addition, each day of continuing violation after written notification from the Division of Air Quality may be considered a separate offense.

Please provide to this office as soon as possible, **but no later than 3 May 2019**, a written response to this Notice of Violation. The response should outline what steps you have taken, or plan to take, to ensure compliance with the cited requirements and the date by which you achieved, or anticipate achieving, compliance. The response should also include any additional information or description of any mitigating circumstances in reference to the violation. Finally, you indicated in your 4 April 2019 response that a temperature data recorder has been installed on the RTO; therefore, please include documentation that shows the temperature in the oxidizer is being maintained at a minimum of 1,500 degrees Fahrenheit, based on a 3-hour rolling average as required in your current air permit.

After the above date, in lieu of any mitigating circumstances brought to our attention, this office will submit the enforcement report to the Director of the Division of Air Quality, including recommendations for the assessment of appropriate civil penalties. Please be advised that neither

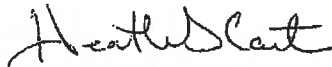


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this letter, nor any subsequent action, absolve you from responsibility for any violation or damage to public or private property or from any enforcement action available to this agency.

The DAQ appreciates your prompt attention to this matter. We strongly recommend you carefully examine your current air permit stipulations. If you have any questions regarding the cited violations or your permit, please contact Stephen Allen, Environmental Specialist, or Jeffrey Cole, Environmental Engineer, at (910) 433-3300.

Sincerely,



Heather S. Carter
Regional Supervisor
NCDEQ, Division of Air Quality

HSC\sca

cc: FRO Facility Files
Enforcement Files



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ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL A. ABRACZINSKAS
Director



NORTH CAROLINA
Environmental Quality

11 June 2019

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Satish Sharma, President
Reliance Packaging, LLC
175 Anderson Street
Aberdeen, North Carolina 28315

SUBJECT: Notice of Violation/Recommendation for Enforcement
N.C. General Statute 143-215.108 - Construction of New Air Pollution
Sources or Air Cleaning Devices Prior to Obtaining an Air Quality Permit
Reliance Packaging Air Permit No. 10586R00
Aberdeen, Moore County, NC 06/6300110 Fee Class: Synthetic Minor

Dear Mr. Sharma:

On 23 May 2019, Stephen Allen and Abdul Kadir with the Division of Air Quality (DAQ), Fayetteville Regional Office (FRO), conducted a follow-up compliance inspection at Reliance Packaging located in Aberdeen, Moore County. During the inspection they observed a new, unpermitted printing press that had been constructed in your facility. This printing press is in addition to the two other printing presses currently permitted under Air Permit No. 10586R00.

On 13 March 2019, during the initial compliance inspection of the facility, Mr. Prots, General Manager, told Mr. Allen and Mr. Kadir of the facility's plan to add a new press. Mr. Allen informed Mr. Prots of the requirement to submit a permit modification application and to have the modified air permit issued prior to beginning construction on any new emission sources or control devices. He also advised Mr. Prots to contact Greg Reeves, FRO DAQ Permits Coordinator, with any questions about forms, procedures or processes necessary to obtain the modified air permit prior to construction.

On 20 March 2019, Mr. Allen and Mr. Reeves spoke with you by telephone about the addition of the new printing press. Mr. Reeves advised that the permit modification would require a PE Seal and a zoning determination. Mr. Reeves also stated that construction of the new printing press could not begin until the modified permit was issued by this office. Your permit application was received in the FRO DAQ on 8 May 2019 and is currently being processed.

North Carolina General Statute 143-215.108 requires that construction of new air pollution sources or air cleaning devices, or modifications to the sources or air cleaning devices must be covered under a permit issued by the Division of Air Quality prior to construction.



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Failure to do so is a violation of G.S. 143-215.108 and may subject the Permittee to civil or criminal penalties as described in G.S. 143-215.114A and 143-215.114B. **Construction of the new printing press prior to obtaining an air quality permit constitutes a violation of G.S. 143-215.108.**

Be advised, this is the second violation on record for your facility for constructing an air pollution emission source without first obtaining an air quality permit. In August 2018 you submitted a permit application for two printing presses and a Regenerative Thermal Oxidizer (RTO) control device. It was discovered that the presses had already been constructed at your facility and the RTO was in the process of being constructed. On 3 August 2018, this office issued your facility a Notice of Violation for constructing the printing presses and RTO without first obtaining an air permit.

As stated in the "subject" above, this letter represents not only a Notice of Violation for the above-cited violation, but puts you on notice that this office is preparing an enforcement report addressing the violation. The above violation and any future violation of an air quality regulation are subject to the assessment of civil penalties per North Carolina General Statute 143-215.114A. This General Statute provides that civil penalties of not more than twenty-five thousand dollars (\$25,000) may be assessed against any person who violates any classification, standard, or limitation established pursuant to General Statute 143-215.107, "Air Quality Standards and Classifications." In addition, each day of continuing violation after written notification from the Division of Air Quality shall be considered a separate offense.

Please provide to this office as soon as possible, **but no later than 25 June 2019**, a written response detailing: 1) the reasons for the above-cited violation, 2) the steps that you plan to take to stop this repeating pattern of violation in the future, and 3) any additional information or description of any mitigating circumstances in reference to the violation. Be advised that operation of this equipment is NOT authorized prior to the issuance of the air quality permit. In addition, if you have plans to install other sources of air pollution or control equipment in the future, please contact the FRO DAQ air permitting staff prior to construction to discuss whether an air quality permit is required.

The Fayetteville Regional Office, Division of Air Quality appreciates your prompt attention to this matter. If you have any questions regarding the cited violation or your permit, please contact Gregory Reeves, Permits Coordinator, or me at (910) 433-3300.

Sincerely,



Heather S. Carter
Regional Air Quality Supervisor
NCDEQ, Division of Air Quality

HSC\asca

cc: FRO Facility Files
FRO Enforcement Files



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Director



NORTH CAROLINA
Environmental Quality

11 June 2019

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Satish Sharma, President
Reliance Packaging, LLC
175 Anderson Street
Aberdeen, North Carolina 28315

SUBJECT: Notice of Violation/Recommendation for Enforcement
N.C. General Statute 143-215.108 - Construction of New Air Pollution
Sources or Air Cleaning Devices Prior to Obtaining an Air Quality Permit
Reliance Packaging Air Permit No. 10586R00
Aberdeen, Moore County, NC 06/6300110 Fee Class: Synthetic Minor

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IX. CONCLUSIONS / RECOMMENDATIONS:

At the time of the inspection on 23 May 2019, the Reliance Packaging facility appeared to be **IN VIOLATION** with the following Permit Specific Conditions and Limitations. I recommend an NOV/NRE for these violations:

- General Condition B.6 - G.S. 143-215.108 for construction of the new printing press without obtaining an air permit.

PINK SHEET ITEMS:

None .

/sca

Failure to do so is a violation of G.S. 143-215.108 and may subject the Permittee to civil or criminal penalties as described in G.S. 143-215.114A and 143-215.114B. **Construction of the new printing press prior to obtaining an air quality permit constitutes a violation of G.S. 143-215.108.**

Be advised, this is the second violation on record for your facility for constructing an air pollution emission source without first obtaining an air quality permit. In August 2018 you submitted a permit application for two printing presses and a Regenerative Thermal Oxidizer (RTO) control device. It was discovered that the presses had already been constructed at your facility and the RTO was in the process of being constructed. On 3 August 2018, this office issued your facility a Notice of Violation for constructing the printing presses and RTO without first obtaining an air permit.

As stated in the "subject" above, this letter represents not only a Notice of Violation for the above-cited violation, but puts you on notice that this office is preparing an enforcement report addressing the violation. The above violation and any future violation of an air quality regulation are subject to the assessment of civil penalties per North Carolina General Statute 143-215.114A. This General Statute provides that civil penalties of not more than twenty-five thousand dollars (\$25,000) may be assessed against any person who violates any classification, standard, or limitation established pursuant to General Statute 143-215.107, "Air Quality Standards and Classifications." In addition, each day of continuing violation after written notification from the Division of Air Quality shall be considered a separate offense.

Please provide to this office as soon as possible, **but no later than 25 June 2019**, a written response detailing: 1) the reasons for the above-cited violation, 2) the steps that you plan to take to stop this repeating pattern of violation in the future, and 3) any additional information or description of any mitigating circumstances in reference to the violation. Be advised that operation of this equipment is NOT authorized prior to the issuance of the air quality permit. In addition, if you have plans to install other sources of air pollution or control equipment in the future, please contact the FRO DAQ air permitting staff prior to construction to discuss whether an air quality permit is required.

The Fayetteville Regional Office, Division of Air Quality appreciates your prompt attention to this matter. If you have any questions regarding the cited violation or your permit, please contact Gregory Reeves, Permits Coordinator, or me at (910) 433-3300.

Sincerely,



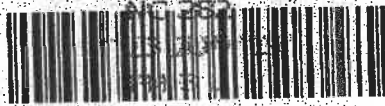
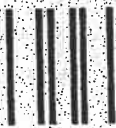

Heather S. Carter
Regional Air Quality Supervisor
NCDEQ, Division of Air Quality

HSC\sca
cc: FRO Facility Files
FRO Enforcement Files



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SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> <i>Karishma Sharma</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressed</p>
<p>1. Article Addressed to:</p> <p>MR SATISH SHARMA, PRESIDENT RELIANCE PACKAGING, LLC 175 ANDERSON STREET ABERDEEN, NC 28315</p>	<p>B. Received By (Printed Name) C. Date of Delivery <input checked="" type="checkbox"/> <i>KARISHMA SHARMA</i> <i>6/13/19</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
 9590 9402 3776 8032 5028 56	<p>3. Service Type</p> <input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery <input type="checkbox"/> Insured Mail Restricted Delivery
<p>2. Article Number (Transfer from service label)</p> <p>7015 0640 0007 8168 4386</p>	
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return F</p>	

<p>USPS TRACKING # 1:</p>  9590 9402 3776 8032 5028 56		<p>First-Class Mail Postage & Fees Paid USPS Permit No. G-10</p>
<p>United States Postal Service</p>	<p>• Sender: Please print your name, address, and ZIP+4® in this box•</p> <p>NC DEQ – FAYETTEVILLE REGIONAL OFFICE DIVISION OF AIR QUALITY ATTN: HEATHER CARTELL 225 GREEN STREET, SUITE 714 FAYETTEVILLE NC 28301</p> <p>RECEIVED JUN 17 2019</p> <p>DEQ-FAYETTEVILLE REGIONAL OFFICE</p>	
		

III. FACILITY DESCRIPTION

Reliance Packaging is an offset printing operation located in Aberdeen, Moore County. The facility produces various plastic bag products for items such as gardening mulch. The packaging materials have printing applied through the use of two (2) flexographic printing presses. These presses use various inks and solvents that contain VOC, and have small electric heaters to dry the inks and coatings. VOC emissions from these two presses are controlled by the use of a natural gas-fired regenerative thermal oxidizer. The facility also operates a small solvent recovery still to recover some used solvents from the printing presses.

IV. PERMITTED SOURCES

Emission Source ID	Emission Source Description	Control System ID	Control System Description
ES-1	8 Color Flexographic Printing Press PCMC 7991 with electric heaters Operating with 0% opacity	CD1	Natural Gas-fired Regenerative Thermal Oxidizer 4 mmBtu/hr maximum heat input
ES-2	6-Color Flexographic Printing Press Schiavi/Padane Sirio 146 with electric heaters Operating with 0% opacity		

V. INSPECTION SUMMARY

On 23 May 2019, I Stephen Allen and Abdul Kadir, both of FRO DAQ, arrived at the facility to conduct a follow-up compliance inspection. We met with Mr. Tom Prots, General Manager, and John Van Der Noord, Maintenance Manager. The primary purpose of the follow-up inspection was to verify the installation and proper operation of the new control panel on the regenerative thermal oxidizer. During the initial inspection on 13 March 2019, the control panel on the RTO was not functioning and the facility had no way to verify the RTO was operating/maintaining the required 1500 degree (F) temperature. Mr. Prots and Mr. Van Der Noord led us over to the printing facility and we observed the RTO operating while both presses were running. Mr. Van Der Noord showed us the new control panel for the RTO and scrolled through the various screens to show us how they created the outputs. Mr. Van Der Noord stated they were still trying to get the RTO to produce more user-friendly outputs. I asked Mr. Van Der Noord to send us a copy of the most recent output so we could determine if the RTO was maintaining proper temperature when operating.

While on site we observed the new printing press that the facility ordered which was already being assembled in the printing facility. The new press was in place with all of the control panels installed. Additionally, all ductwork was in place on top of the press ready to be connected to the existing ductwork controlling ES-1 and ES-2. I advised Mr. Prots that they were not supposed to begin installation of the new press until the permit modification had been approved by our office. Mr. Prots stated that he was under the impression that they were not violating the permit as long as they were not operating the press and they were told "by the state" that they could put it in place. I told Mr. Prots I had been on a call with Mr. Sharma and Greg Reeves of FRO DAQ and he told Mr. Sharma that construction of the press could not commence until the permit modification was approved. Mr. Prots stated they were hoping to get the permit modification approved as quickly as possible because a training crew from the press manufacturer was going to be scheduled to train Reliance staff on how to operate the new press. I told Mr. Prots that the press could not be operated until the permit modification is complete.

VI. PERMIT STIPULATIONS

- A. 15A NCAC 2D .0202 – PERMIT RENEWAL AND EMISSION INVENTORY REQUIREMENT** – The Permittee shall submit a permit renewal application and an air pollution inventory report at least 90 days prior to the expiration of the permit.

COMPLIANCE NOT DETERMINED

- B. 15A NCAC 2D .0515 – PARTICULATES CONTROL REQUIREMENT** – Particulate emissions shall not exceed allowable emission rates as calculated by the following equations:

$$E = 4.10 * (P)^{0.67} \quad \text{for } P \leq 30 \text{ tons/hr, or}$$
$$E = 55 * (P)^{0.11} - 40 \quad \text{for } P > 30 \text{ tons/hr}$$

COMPLIANCE NOT DETERMINED

- C. 15A NCAC 2D .0516 – SULFUR DIOXIDE CONTROL REQUIREMENT** – Sulfur dioxide emissions from the combustion sources shall not exceed 2.3 pounds per million Btu (lbs/mmBtu) heat input.

COMPLIANCE NOT DETERMINED

- D. 15A NCAC 2D .0521 – VISIBLE EMISSIONS CONTROL REQUIREMENT** – Visible emissions from each emission source manufactured after 1 July 1971, shall not exceed 20% opacity when averaged over a six-minute period.
APPEARED IN COMPLIANCE – We did not observe any visible emission from any emission sources during the inspection. The RTO was operating during the inspection.

- E. 15A NCAC 2D .0535 – NOTIFICATION REQUIREMENT** – The Permittee of a source of excess emissions that last for more than four hours and that results from a malfunction, a breakdown of process or control equipment or any other abnormal conditions, shall notify DAQ of the occurrence.

COMPLIANCE NOT DETERMINED

- F. 15A NCAC 2D .0540 – FUGITIVE DUCT CONTROL REQUIREMENT** – The Permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary.

COMPLIANCE NOT DETERMINED

- G. 15A NCAC 02D .0611 – THERMAL OXIDIZER REQUIREMENTS** – VOC and HAP emissions shall be controlled as described in the permitted equipment list. Properly operate, inspect, and maintain the control devices, minimum operating temperature of 1500 °F (815°C) continuous recording of operating temp I&M per manufacturer specs, annual internal inspection, and perform and document I&M.
APPEARED IN COMPLIANCE – Maintenance manager, John Van Der Noord, showed us the newly installed control panel for the thermal oxidizer. The RTO was operating at a temperature of 1514 degrees (F). On 30 May 2019, Mr. Van Der Noord provided us with an output from the RTO that showed the thermal oxidizer was operating and appeared to be

maintaining the proper temperature. The initial output was difficult to follow. We suggested the facility work to provide a more user-friendly output with a potential graph to show that the thermal oxidizer is maintaining the proper temperature.

- H. 15A NCAC 2D .1806 – CONTROL AND PROHIBITION OF ODOROUS EMISSIONS**
– The facility shall not contribute to objectionable odors beyond the facility's property boundary.

COMPLIANCE NOT DETERMINED

- I. 15A NCAC 02D .0315 – LIMITATION TO AVOID 15A NCAC 2Q .0501** – The facility shall maintain temperatures and perform periodic inspection and maintenance as required by the specific condition and limitation 15 NCAC 2D .0611 – Thermal Oxidizer Requirements.

APPEARED IN COMPLIANCE – During the inspection, we noted the following:

Operation Restrictions – The thermal oxidizer was operating at 1514 degrees (F) and Mr. Van Der Noord provided us with outputs that appeared to be in compliance with the operating requirements. Working with the facility to provide more user-friendly outputs from the RTO.

Recordkeeping – Mr. Prots and Mr. Van Der Noord were able to provide a record for continuously monitoring the operating temperature on the thermal oxidizer. The initial output from the RTO is difficult to decipher. We have suggested the facility try to provide outputs that more readily show the rolling 3 hour average or possibly graph the output from the RTO.

- J. 15A NCAC 02D .0317 – LIMITATION TO AVOID 15A NCAC 2Q .0530** – Facility wide PM10 and VOC emissions shall both be less than 250 tons per year. The facility complies with this permit condition by complying with the specific condition and limitation 15A NCAC 2D .0315 – Limitation to Avoid 15A NCAC 2Q.0501 (see section 6.K above).

APPEARED IN COMPLIANCE – During the inspection the thermal oxidizer was operating at 1514 degrees (F) and Mr. Van Der Noord provided us with outputs that appeared to be in compliance with the operating requirements. Working with the facility to provide more user-friendly outputs from the RTO.

- K. TOXIC AIR POLLUTANT EMISSIONS LIMITATION REQUIREMENT** - Pursuant to 15A NCAC 2Q .0711 – The facility shall be operated and maintained in such a manner that emissions of any listed TAPs from the facility, including fugitive emissions, will not exceed TPERs listed in 15A NCAC 2Q .0711(a)

APPEARED IN COMPLIANCE – Compliance was determined during the most recent permit review based on operating the source as described in the permit conditions. No changes have been made to operations since that determination. Several violations were noted during the initial inspection on 13 March 2019. The facility has been operating their presses without running the thermal oxidizer. FRO DAQ requested the following information from the facility:

- Production totals from start date of production – through February 2019
- Monthly and 12-month rolling total of VOC emissions without controls
- Total VOC/HAP/TAP emissions without controls
- Documentation of operating regenerative thermal oxidizer at minimum operating temperature of 1500°F (815°C).

FRO DAQ received a response from the facility on 6 July 2019 and reviewed the results for the estimated potential emissions. The facility does not appear to have exceed TPER limits and are currently operating the regenerative thermal oxidizer at the required temperature.

- L. GENERAL CONDITION B.6 - G.S. 143-215.108(C)(1) PROPER OPERATION**
General Condition B.6, requires that "...In accordance with G.S. 143-215.108(c)(1), the facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air cleaning device(s) and appurtenances..."

VIOLATION NOTED – During the inspection, the thermal oxidizer was running and Mr. Van Der Noord provided us with outputs from the thermal oxidizer that appear in compliance with the permit requirements. Working with the facility to produce more user-friendly outputs from the RTO that potentially graph the results.

The facility began construction of a new printing press prior to having a permit modification approved by FRO DAQ. On 13 March 2019, during the initial compliance inspection of the facility, Mr. Prots, General Manager, told Mr. Allen and Mr. Kadir of the facility's plan to add a new press. Mr. Allen informed Mr. Prots of the requirement to submit a permit modification application and to have the modified air permit issued prior to beginning construction on any new emission sources or control devices. He also advised Mr. Prots to contact Greg Reeves, FRO DAQ Permits Coordinator, with any questions about forms, procedures or processes necessary to obtain the modified air permit prior to construction.

On 20 March 2019, Mr. Allen and Mr. Reeves spoke with Mr. Satish Sharma, President, by telephone about the addition of the new printing press. Mr. Reeves advised that the permit modification would require a PE Seal and a zoning determination. Mr. Reeves also stated that construction of the new printing press could not begin until the modified permit was issued by this office. Your permit application was received in the FRO DAQ on 8 May 2019 and is currently being processed.

- VII. 112(r) APPLICABILITY:** The facility does not store any of the listed chemicals above threshold limits and is not required to maintain a written Risk Management Plan (RMP).

VIII. NON-COMPLIANCE HISTORY SINCE 2010:

3 August 2018 - Notice of Violation - N.C. General Statute 143-215.108

Construction of New Air Pollution Sources or Air Cleaning Devices Prior to Obtaining an Air Quality Permit

17 April 2019 – **Notice of Violation/Notice of Recommendation for Enforcement:**

15A NCAC 02D .0614 – Thermal Oxidizer Requirements

15A NCAC 02Q .0315 – Limitation to Avoid 15A NCAC 02Q .0501

15A NCAC 02Q .0317 – Limitation to Avoid 15A NCAC 02Q .0530

General Condition B.6 - G.S. 143-215.108(c)(1) Proper Operation

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RECEIVED

JUN 20 2019

DEQ-FAYETTEVILLE REGIONAL OFFICE

June 17th, 2019

Ms. Heather Carter
Regional Supervisor – Fayetteville Regional Office
NCDEQ, Division of Air Quality
225 Green Street, Suite 714
Fayetteville, NC 28301-5094

Subject: Response to June 11th, 2019 Notice of Violation
Reliance Packaging, Permit No. 10586/R00
Aberdeen, NC Moore County, Facility ID: 6300110

Dear Heather,

We received your letter dated June 11th regarding our air quality permit along with a request for a written response.

1. The printing press observed during the inspection is a used unit, and, as a condition of the sale, the seller required us to remove it from their property immediately; this is a common condition in the purchase of used equipment. The press components were only placed in position; no permanent changes to the site have been made. The electric power and natural gas have not been connected, therefore it is impossible to operate. The press, and condition of the utilities were voluntarily shown to Mr. Abdul Kadir and he took photo's during his last visit.

When Mr. Prots and I discussed plans to install a used press with NCDEQ staff, there may have been confusion about the actual steps involved in securing a used piece of equipment versus ordering a new one. The permit application process was started promptly after speaking with NCDEQ staff; the major delay in getting the application submitted centered around obtaining the Zoning Determination.

We have been waiting for a response on our permit application before commencing installation and were not aware that storage of used machinery was a violation of our permit.

2. At this time, Reliance does not intend to purchase any additional equipment. Reliance would like to discuss with NCDEQ what provisions can be made for securing used equipment and air permitting should there be another business opportunity in the future involving used equipment and additional employment in Moore County.

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3. I would appreciate the opportunity to meet with you in person at your offices in Fayetteville to discuss this situation and our facility here in NC, we have tried to be transparent with all communications and it was unfortunate that I was not present during the last two inspections. As voluntarily shown to NCDEQ inspectors, the press cannot be operated without some significant permanent site work; this site work will not be performed until the issuance of the permit modification is complete.

Sincerely,



Satish Sharma
Reliance Packaging
155 Anderson Street
Aberdeen, NC 28315

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com

OFFICIAL USE

Certified Mail Fee \$ _____

Extra Services & Fees (check box, add fee as appropriate)

Return Receipt (hardcopy) \$ _____

Return Receipt (electronic) \$ _____

Certified Mail Restricted Delivery \$ _____

Adult Signature Required \$ _____

Adult Signature Restricted Delivery \$ _____

Postage \$ _____

Total Postage and Fees \$ 6.80

Sent to Sande Sharma / Reliance Packaging
 Street and Apt. No., or PO Box No. 175 Anderson St
 City, State, ZIP+4® Aberdeen NC 28315

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions



NORTH CAROLINA
 Environmental Quality

17 April 2019

Letter was returned as undeliverable. A copy of letter was emailed, and a response was received on 05/03/19.

Resp
 to
 4/17/2019
 non

Cert
 Copy

Reliance Packaging
 175 Anderson Street
 Aberdeen, NC 28315

SUBJECT: Notice of Violation/Notice of Recommendation for Enforcement:
 15A NCAC 02D .0611 – Thermal Oxidizer Requirements
 15A NCAC 02Q .0315 – Limitation to Avoid 15A NCAC 02Q .0501
 15A NCAC 02Q .0317 – Limitation to Avoid 15A NCAC 02Q .0530
 General Condition B.6 - G.S. 143-215.108(c)(1) Proper Operation
 Reliance Packaging Permit No. 10586/R00
 Aberdeen, NC, Moore County Facility ID: 6300110 Fee Class: Synthetic Minor

Dear Mr. Sharma:

On 13 March 2019, Stephen Allen and Abdul Kadir, both with the Fayetteville Regional Office of the Division of Air Quality (FRO DAQ), met with Tom Prots, General Manager, and John Vandernoord, Maintenance Manager, to conduct a full air quality compliance inspection of Reliance Packaging, in Aberdeen, Moore County, NC. On 22 March 2019, this office sent you a Compliance Additional Information Request letter as a follow on to the inspection. On 4 April 2019 we received your response to the information request. Based on observations during the inspections and information provided in your response, the following are documented violations of your air permit:

I. Specific Condition and Limitation A.8: 15A NCAC 02D .0611 – Thermal Oxidizer Requirements & General Condition B.6 - G.S. 143-215.108(c)(1) Proper Operation

Specific Condition and Limitation A.8: 15A NCAC 02D .0611 – Thermal Oxidizer Requirements requires that “... VOC, HAP, and TAP emissions shall be controlled as described in the permitted equipment list.” The permitted equipment list states that emissions from the 8 Color Flexographic Printing Press PCMC 7991 (Source ID No. ES-1) and 6 Color Flexographic Printing Press Schiavi//Padane Sirio 146 (Source ID No. ES-2) are controlled by the Natural Gas-fired Regenerative Thermal Oxidizer (RTO). In addition, General Condition B.6, requires that “...In accordance with G.S. 143-215.108(c)(1), the facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified



North Carolina Department of Environmental Quality | Division of Air Quality
 Fayetteville Regional Office | 225 Green Street, Suite 714 | Fayetteville, North Carolina 28301-5094
 910.433.3300 T | 910.485.7467 F

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May 3, 2019

Ms. Heather Carter
Regional Supervisor – Fayetteville Regional Office
NCDEQ, Division of Air Quality
225 Green Street, Suite 714
Fayetteville, NC 28301-5094

Subject: Response to April 17, 2019 Notice of Violation
Reliance Packaging, Permit No. 10586/R00
Aberdeen, NC Moore County, Facility ID: 6300110

Dear Heather,

We received your letter dated April 17th regarding documented violations of our air permit along with a request for a written response to the Notice of Violation.

The Data recorder was purchased directly from CMM who originally manufactured the RTO unit and we installed it on April 2nd, 2019. Please find attached photos of both the Panel display and the Data Recorder (Attachment 1).

The data recorder is set to capture the temperature every 10 seconds. We downloaded the information and exported it to an excel spreadsheet, please see the attached document that contains the date, time and temperature of the RTO chamber every hour along with corresponding production information of how many rolls were printed. Please advise if this format is acceptable for our monthly record requirements (see Attachment 2 for raw data and summaries).

* We reduce the temperature of the RTO unit to 1,000 degrees when the RTO is in a standby mode or switch it off when we are not operating for an extended period. We cannot operate the printing equipment when the chamber temperature drops below 1,500 degrees due to the interlock system. The interlock system was only disabled previously during operational or control shakedown periods to either ensure proper press operation with the RTO and to identify issues with the RTO control system and interlock. For safety and compliance purposes, these interlocks are not disabled during normal printing operations.

We regret not having replaced the Data Recorder sooner when the RTO was started last September and remain committed to compliance with The Division of Air Quality and our

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permit. As you will be able to see in the attached data, documentation will be available to validate proper RTO operation.

It should be noted that most thermocouples (and corresponding emission standards) allow for an accuracy range of +/- 50 degrees Fahrenheit. The 3-hour average chamber temperatures of the RTO while a press is running are typically between 1,494 degrees F and 1,501 degrees F. After reviewing the logged data for April, we increased the setpoint temperature from 1,500 degrees F to 1,520 degrees F to allow for RTO temperature cycling during low coverage jobs. *

Finally, we also wanted to provide an update on the emissions calculations and methodology (Attachment 3). The net result of utilizing more accurate VOC emissions (rather than conservative assumptions regarding ink and solvent VOC content and consumption quantities) is a decrease in calculated emissions below 100 tons per year.

Inks: The initial submission of emissions data included estimated VOC Content for inks in use. Since the initial submission, Reliance has worked with the ink supplier, CAI, to provide and obtain monthly reports of ink purchase quantities, and per ink VOC data. These reports did not modify the purchase quantities, but did alter the monthly VOCs in ink downward, as conservative high VOC contents were used where VOC contents were not provided.

Solvents: The initial submission of emissions data did not include any inventory reconciliation or emission adjustments. Monthly ending inventory quantities in conjunction with internal use quantities resulted in reduced VOC emissions. Starting in March, the "used" quantity will be replaced by purchase data provided directly by our vendor.

We appreciate your guidance and extend our full cooperation. This was not an intentional violation and we respectfully request if it is possible to waive any portion or all of the potential civil penalties as this is our first offense first dealings with operating under an air quality permit.

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If you have any questions regarding this request, please contact me using my contact information below, or our recently engaged environmental consultant Chris Maye of CMI at 215-699-4800x112 or cell at 215-692-3385.

Sincerely,



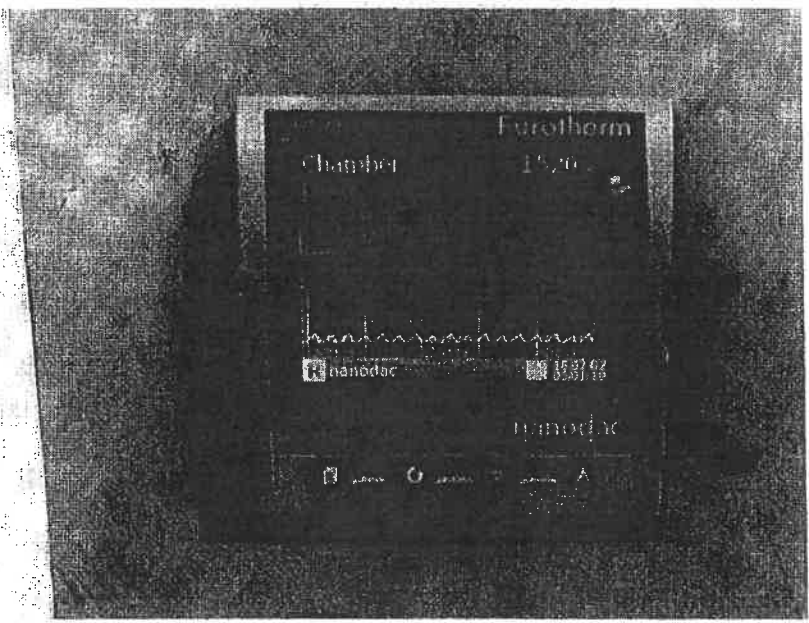
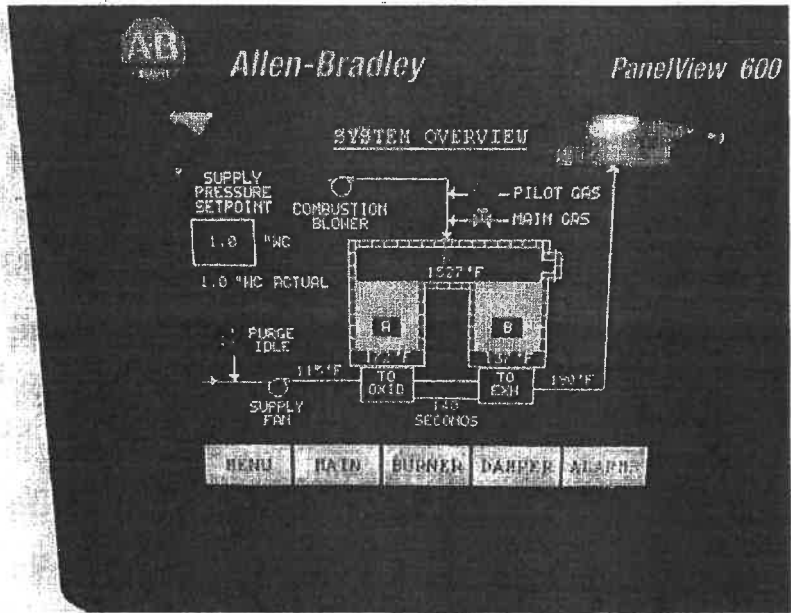
Satish Sharma
Reliance Packaging
155 Anderson Street
Aberdeen, NC 28315

Enclosures:

- ATTACHMENT 1 – Panel Display and Data Recorder
- ATTACHMENT 2 – Data Recorder Data Summaries
- ATTACHMENT 3 – Updated Emissions Calculations and Backup Data

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ATTACHMENT 2

Data Recorder Data Summaries

Reliance Packaging - Production Log

Date/Time	Job #	Shift 1	Shift 2	Shift 1	Shift 2	Total Lbs	Total Rolls	Day Lbs	Day Rolls
		Lbs	Lbs	Rolls	Rolls				
4/2/2019 10:00									
4/2/2019 13:00									
4/2/2019 16:00						0	0		
4/2/2019 19:00	219027	2191	8682	4	17	10873	21		
4/2/2019 22:00	319027	7812		15		7812	15	18685	36
4/3/2019 1:00						0	0		
4/3/2019 4:00						0	0		
4/3/2019 7:00	219027	1651		3		1651	3		
02:58.7	319027	8012	2947	16	6	10959	22		
04:29.5	219029	10862		20		10862	20		
4/3/2019 9:04	219028	500		1		500	1		
4/3/2019 10:00									
4/3/2019 13:00	419002	9359	2404	17	5	11763	22	35735	68
4/3/2019 16:00						0	0		
4/3/2019 19:00						0	0		
4/3/2019 22:00						0	0		
4/4/2019 1:00						0	0		
4/4/2019 4:00						0	0		
4/4/2019 7:00	219072	8831	3084	17	6	11915	23		
41:38.7	419002		2761		5	2761	5		
42:18.1	119032		7364		9	7364	9		
42:33.7	1018032		4189		8	4189	8		
4/4/2019 10:00	119026	7739		10		7739	10	33968	55
4/4/2019 13:00						0	0		
4/4/2019 16:00						0	0		
4/4/2019 19:00						0	0		
4/4/2019 22:00						0	0		
4/5/2019 1:00						0	0		
4/5/2019 4:00						0	0		
4/5/2019 7:00	119024	5896		8		5896	8		
4/5/2019 10:00	119013		1016		2	1016	2		
4/5/2019 13:00	219060		5801		11	5801	11		
4/5/2019 16:00	1018089		1562		3	1562	3	14275	24
4/5/2019 19:00						0	0		
4/5/2019 22:00						0	0		
4/6/2019 1:00						0	0		
4/6/2019 4:00						0	0		
4/6/2019 7:00	1018090	2508		5		2508	5		
4/6/2019 10:00	219061	2518		5		2518	5		
4/6/2019 13:00	1018057	2555		5		2555	5		
02:28.2	219032	7960		15		7960	15	15541	30
02:28.2						0	0		
02:28.2						0	0		
02:28.2						0	0		
08:08.2						0	0		
08:08.2						0	0		
08:08.2						0	0		
08:08.2						0	0		
09:23.2						0	0		
09:23.2						0	0		
09:23.2						0	0		

Reliance Packaging - Production Log

Date/Time	Job #	Shift 1	Shift 2	Shift 1	Shift 2	Total Lbs	Total Rolls	Day Lbs	Day Rolls
09:23.2						0	0		
4/6/2019 16:00						0	0		
4/6/2019 19:00						0	0		
4/6/2019 22:00						0	0		
4/7/2019 1:00						0	0		
4/7/2019 4:00						0	0		
4/7/2019 7:00									
4/7/2019 10:00									
4/7/2019 13:00	219077	4548		8		4548	8		
4/7/2019 16:00	1018094	546		1		546	1	5094	9
4/7/2019 19:00						0	0		
4/7/2019 22:00						0	0		
4/8/2019 1:00						0	0		
4/8/2019 4:00						0	0		
4/8/2019 7:00									
4/8/2019 10:00									
4/8/2019 13:00	1018094	2175		5		2175	5		
4/8/2019 16:00	219077	1014		2		1014	2		
4/8/2019 19:00	219030	6118		12		6118	12		
4/8/2019 22:00	219034	4054		8		4054	8	13361	27
4/9/2019 1:00						0	0		
4/9/2019 4:00						0	0		
4/9/2019 7:00	219030	6895	6489	13	13	13384	26		
4/9/2019 10:00	319014	1018		2		1018	2		
4/9/2019 13:00	219017	2510		5		2510	5		
4/9/2019 16:00	219071	1552			5	1552	5		
4/9/2019 19:00	219076	4164		8		4164	8	22628	46
4/9/2019 22:00						0	0		
4/10/2019 1:00						0	0		
4/10/2019 4:00						0	0		
4/10/2019 7:00	219029	7873	2812	14	5	10685	19		
4/10/2019 10:00	319034	4918	2121	10	4	7039	14		
4/10/2019 13:00	219025	1673	1315	3	8	2988	11		
4/10/2019 16:00	319044	2668		5		2668	5		
4/10/2019 19:00	419010		1121		3	1121	3	24501	52
4/10/2019 22:00						0	0		
4/11/2019 1:00						0	0		
4/11/2019 4:00						0	0		
4/11/2019 7:00	219019	1571	1072	3	2	2643	5		
4/11/2019 10:00	419010		2444		5	2444	5		
4/11/2019 13:00	419011	1963		4		1963	4		
4/11/2019 16:00	219015	2474		5		2474	5		
4/11/2019 19:00	219019	1571		3		1571	3		
4/11/2019 22:00	419009	1251		2		1251	2	12346	24
4/12/2019 1:00	419001	1010	9673	2	18	10683	20		
4/12/2019 4:00	1118087	2887		6		2887	6		
4/12/2019 7:00	1118086	3652		7		3652	7		
4/12/2019 10:00	219074		2624		5	2624	5		
4/12/2019 13:00	419001	10933		20		10933	20		
4/12/2019 16:00	119274	5536		11		5536	11		
4/12/2019 19:00	419001		6575	12		6575	12	42890	81
4/12/2019 22:00						0	0		

Reliance Packaging - Production Log

Date/Time	Job #	Shift 1	Shift 2	Shift 1	Shift 2	Total Lbs.	Total Rolls	Day Lbs.	Day Rolls
4/13/2019 1:00						0	0		
4/13/2019 4:00						0	0		
4/13/2019 7:00	218050	3758	1564	8	3	5322	11		
4/13/2019 10:00	119041		2635		5	2635	5		
4/13/2019 13:00	119042		2750		5	2750	5		
4/13/2019 16:00	319020	11260	7061	22	14	18321	36		
4/13/2019 19:00	319016	9957		12		9957	12		
4/13/2019 22:00	19014	2067		4		2067	4	41052	73
4/14/2019 1:00						0	0		
4/14/2019 4:00						0	0		
4/14/2019 7:00						0	0		
4/14/2019 10:00						0	0		
4/14/2019 13:00						0	0		
4/14/2019 16:00						0	0		
4/14/2019 19:00						0	0		
4/14/2019 22:00						0	0		
4/15/2019 1:00						0	0		
4/15/2019 4:00						0	0		
4/15/2019 7:00									
4/15/2019 10:00	319020	5402		11		5402	11		
4/15/2019 13:00	319025	6153		13		6153	13	11555	24
4/15/2019 16:00						0	0		
4/15/2019 19:00						0	0		
4/15/2019 22:00						0	0		
4/16/2019 1:00						0	0		
4/16/2019 4:00						0	0		
4/16/2019 7:00									
4/16/2019 10:00									
4/16/2019 13:00	319025	10421		21		10421	21		
4/16/2019 16:00	319020	9825		19		9825	19	20246	40
4/16/2019 19:00						0	0		
4/16/2019 22:00						0	0		
4/17/2019 1:00						0	0		
4/17/2019 4:00						0	0		
4/17/2019 7:00	319024	2610	8732	5	17	11342	22		
4/17/2019 10:00	319023	9318		18		9318	18		
4/17/2019 13:00	419002	5019		12		5019	12		
4/17/2019 16:00	TMSC		2074		4	2074	4		
4/17/2019 19:00	219042		1971		4	1971	4	29724	60
4/17/2019 22:00						0	0		
4/18/2019 1:00						0	0		
4/18/2019 4:00						0	0		
4/18/2019 7:00	319041	1906		4		1906	4		
4/18/2019 10:00	219069		3818		8	3818	8		
4/18/2019 13:00	419008		3579		7	3579	7		
4/18/2019 16:00	119080		2084		4	2084	4		
4/18/2019 19:00	319017	2710	13901	6	27	16611	33	27998	56
4/18/2019 22:00						0	0		
4/19/2019 1:00						0	0		
4/19/2019 4:00						0	0		
4/19/2019 7:00						0	0		
4/19/2019 10:00						0	0		

Reliance Packaging - Production Log

Date/Time	Job #	Shift 1	Shift 2	Shift 1	Shift 2	Total Lbs	Total Rolls	Day Lbs	Day Rolls
4/19/2019 13:00						0	0		
4/19/2019 16:00						0	0		
15:24.2						0	0		
15:24.2						0	0		
15:24.2						0	0		
15:24.2						0	0		
4/19/2019 19:00						0	0		
4/19/2019 22:00						0	0		
4/20/2019 1:00						0	0		
4/20/2019 4:00						0	0		
4/20/2019 7:00	119017	15544		27		15544	27	15544	27
4/20/2019 10:00						0	0		
4/20/2019 13:00						0	0		
4/20/2019 16:00						0	0		
4/20/2019 19:00						0	0		
4/20/2019 22:00						0	0		
4/21/2019 1:00						0	0		
4/21/2019 4:00						0	0		
4/21/2019 7:00						0	0		
4/21/2019 10:00						0	0		
4/21/2019 13:00						0	0		
4/21/2019 16:00						0	0		
4/21/2019 19:00						0	0		
4/21/2019 22:00						0	0		
4/22/2019 1:00						0	0		
4/22/2019 4:00						0	0		
4/22/2019 7:00						0	0		
4/22/2019 10:00	419023		6080		12	6080	12		
4/22/2019 13:00	419014	5717		12		5717	12		
4/22/2019 16:00	1018033	4132		8		4132	8		
4/22/2019 19:00	1018034	6152		12		6152	12	22081	44
4/22/2019 22:00						0	0		
4/23/2019 1:00						0	0		
4/23/2019 4:00						0	0		
4/23/2019 7:00									
4/23/2019 10:00	319037	3843	14411	7	27	18254	34		
23:47.5	1018043		6769		13	6769	13	25023	47
24:57.9						0	0		
4/23/2019 13:00						0	0		
4/23/2019 16:00						0	0		
4/23/2019 19:00						0	0		
4/23/2019 22:00						0	0		
4/24/2019 1:00						0	0		
4/24/2019 4:00						0	0		
4/24/2019 7:00	1018043	1587		3		1587	3	1587	3
4/24/2019 10:00						0	0		
4/24/2019 13:00						0	0		
4/24/2019 16:00						0	0		
54:43.7						0	0		
55:01.6						0	0		
4/24/2019 19:00						0	0		
4/24/2019 22:00						0	0		

Reliance Packaging - Production Log

Date/Time	Job #	Shift 1	Shift 2	Shift 1	Shift 2	Total Lbs	Total Rolls	Day Lbs	Day Rolls
4/25/2019 1:00						0	0		
4/25/2019 4:00						0	0		
4/25/2019 7:00	419016	195		2		195	2		
4/25/2019 10:00	419030	8241		16		8241	16		
4/25/2019 13:00	419018		4479		9	4479	9		
4/25/2019 16:00	419019		2590		8	2590	8		
4/25/2019 19:00	419020	4678		15		4678	15		
4/25/2019 22:00	419021	3852	638	12	2	4490	14	24673	64
4/26/2019 1:00						0	0		
4/26/2019 4:00						0	0		
4/26/2019 7:00	419019	2149		7		2156	7		
4/26/2019 10:00	419004	2832	8314	5	16	11146	21		
4/26/2019 13:00	419029	1864		4		1864	4		
4/26/2019 16:00	419006		6155		12	6155	12	21321	44
09:10.1						0	0		
4/26/2019 19:00						0	0		
								479828	934

514

Month	Day	Hour	1-hour Average (F)	Press Operating?	3-Hour Average (F)
4	2	19	1504	Y	
4	2	20	1499	Y	
4	2	21	1505	Y	1503
4	2	22	1505	Y	1503
4	2	23	1505	Y	1505
4	3	0	1504	Y	1505
4	3	7	1499	Y	1502
4	3	8	1503	Y	1502
4	3	9	1504	Y	1502
4	3	10	1509	Y	1505
4	3	11	1506	Y	1506
4	3	12	1511	Y	1508
4	3	13	1505	Y	1507
4	3	14	1506	Y	1507
4	4	6	1505	Y	1505
4	4	7	1500	Y	1504
4	4	8	1497	Y	1501
4	4	9	1503	Y	1500
4	4	10	1502	Y	1501
4	4	11	1503	Y	1503
4	4	12	1506	Y	1504
4	5	1	1501	Y	1503
4	5	2	1499	Y	1502
4	5	3	1500	Y	1500
4	5	4	1501	Y	1500
4	5	5	1500	Y	1500
4	5	6	1499	Y	1500
4	8	13	1509	Y	1503
4	8	14	1513	Y	1507
4	8	15	1507	Y	1510
4	8	16	1514	Y	1511
4	10	7	1498	Y	1507
4	10	18	1503	Y	1505
4	10	19	1504	Y	1502
4	10	20	1499	Y	1502
4	11	10	1497	Y	1500
4	11	18	1503	Y	1500
4	11	19	1507	Y	1502
4	11	20	1499	Y	1503
4	12	4	1501	Y	1502
4	12	5	1500	Y	1500
4	12	6	1500	Y	1500
4	12	7	1498	Y	1499
4	12	8	1497	Y	1499
4	12	9	1500	Y	1499
4	12	13	1498	Y	1499

Month	Day	Hour	1-hour Average (F)	Press Operating?	3-Hour Average (F)
4	12	14	1497 Y		1498
4	13	2	1500 Y		1498
4	13	3	1498 Y		1498
4	13	4	1501 Y		1500
4	13	11	1502 Y		1500
4	13	12	1502 Y		1502
4	13	13	1504 Y		1502
4	15	12	1500 Y		1502
4	15	13	1502 Y		1502
4	15	14	1504 Y		1502
4	15	15	1506 Y		1504
4	15	16	1506 Y		1506
4	15	17	1500 Y		1504
4	15	18	1505 Y		1504
4	16	15	1495 Y		1500
4	16	16	1510 Y		1503
4	16	17	1513 Y		1506
4	16	18	1507 Y		1510
4	16	19	1504 Y		1508
4	16	20	1499 Y		1503
4	17	16	1498 Y		1500
4	17	17	1499 Y		1499
4	17	18	1498 Y		1498
4	17	19	1498 Y		1498
4	17	20	1497 Y		1498
4	18	4	1499 Y		1498
4	18	5	1497 Y		1498
4	18	6	1500 Y		1499
4	18	7	1500 Y		1499
4	18	8	1495 Y		1499
4	19	7	1496 Y		1497
4	19	8	1497 Y		1496
4	20	8	1497 Y		1496
4	20	9	1496 Y		1496
4	20	10	1498 Y		1497
4	20	22	1498 Y		1497
4	20	23	1497 Y		1497
4	22	10	1497 Y		1497
4	22	11	1498 Y		1497
4	22	12	1498 Y		1498
4	22	13	1497 Y		1498



ATTACHMENT 3

Updated Emission Calculations and Backup Data

Reliance Packaging
Press Ink & Solvent Use & Emissions

YEAR	MON	Solvent (lbs)				Ink (lbs)				VOC EMISSIONS		Emissions	
		Use	VOC	Inv Adj. Use*	Inv. Adj. VOC	Purchase	VOC	Inv Adj. Use*	Inv. Adj. VOC	Control %	Reductions %	(lb/mon)	(tons/rolling 12-month)
2018	Jan	5,196	5,196	4,708	4,708	13,530	7,400	10,640	5,824	0%	0%	10,533	
2018	Feb	14,440	14,440	13,065	13,065	4,241	2,733	3,338	1,789	0%	0%	14,844	
2018	Mar	16,788	16,788	14,760	14,760	19,009	10,041	14,960	7,902	0%	0%	22,662	
2018	Apr	9,952	9,952	9,018	9,018	18,539	9,855	14,550	7,756	0%	0%	18,774	
2018	May	12,608	12,608	11,425	11,425	13,358	9,855	9,648	7,756	0%	0%	19,181	
2018	Jun	9,528	9,528	8,634	8,634	11,660	6,485	9,177	5,107	0%	0%	13,741	
2018	Jul	1,256	1,256	1,138	1,138	8,998	4,945	7,081	3,881	0%	0%	5,030	
2018	Aug	13,536	13,536	12,766	12,766	12,828	6,938	10,096	5,193	0%	0%	17,458	
2018	Sep	10,036	10,036	9,094	9,094	13,698	7,950	10,206	4,683	0%	0%	13,777	
2018	Oct	10,280	10,280	9,315	9,315	20,263	10,724	13,947	8,473	0%	0%	17,795	
2018	Nov	15,048	15,048	13,636	13,636	16,591	8,715	13,026	6,859	0%	0%	20,495	
2018	Dec	17,718	17,718	16,056	16,056	18,579	8,818	13,326	6,940	0%	0%	22,998	87.64
2019	Jan	1,138	1,138	1,138	1,138	16,731	8,600	19,314	9,933	0%	0%	11,071	87.91
2019	Feb	14,270	14,270	4,021	4,021	21,450	10,986	24,775	12,688	0%	0%	16,730	88.84
2019	Mar	10,803	10,803	10,500	10,500	12,634	11,819	26,342	13,651	0%	0%	34,151	89.59
2019	Apr					0	0	0	0	98%	95%	0	91.20
2019	May					0	0	0	0	98%	95%	0	81.61
2019	Jun					0	0	0	0	98%	95%	0	74.74
2019	Jul					0	0	0	0	98%	95%	0	72.23
2019	Aug					0	0	0	0	98%	95%	0	69.50
2019	Sep					0	0	0	0	98%	95%	0	66.61
2019	Oct					0	0	0	0	98%	95%	0	67.71
2019	Nov					0	0	0	0	98%	95%	0	37.46
2019	Dec					0	0	0	0	98%	95%	0	25.97

2018
Start of Year Ink Inventory 0 lbs
End of Year Ink Inventory 35,409 lbs
% adjustment -21%

Start of Year Solvent Inventory 0 lbs
End of Year Solvent Inventory 12750 lbs
% adjustment -9%

Inv Adjusted = (% Change in Inventory over calendar year) * Use

2019
Start of Year Ink Inventory 35,409 lbs
End of Year Ink Inventory 25,963 lbs (MARCH UPDATE)
% adjustment 15%

For Ink: Inv Adjusted = (% Change in Inventory over calendar year) * Use

For Solvent: Inv Adjusted = Use * (Ending Inventory - Starting Inventory)

Ending Solvent Inventory

Jan	11750
Feb	22998
Mar	23360
Apr	
May	
Jun	
Jul	
Aug	
Sep	
Oct	
Nov	
Dec	

		Solvent	
		Used	
Jan	2018		5,196
Feb	2018		14,440
Mar	2018		16,288
Apr	2018		9952
May	2018		12608
Jun	2018		9528
Jul	2018		1256
Aug	2018		13536
Sep	2018		10036
Oct	2018		10280
Nov	2018		15048
Dec	2018		17718
Jan	2019		1138
Feb	2019		14270
Mar	2019		10802

From CHEMSOLV Purchase report

March 2019 VOC Summary


Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
01-1068	SOIL WHITE LO SLIP	11520	45.8%	5,273
01-1283	SOIL BLACK HI STR LO SLIP	3040	54.5%	1,657
01-1292	SOIL NON-SKID LACQUER LO SLIP		64.1%	0
01-2751	SOIL NON-SKID OPV		58.9%	0
04-01-0061	WEATHER-MASTER XT CYAN BLUE LF	70	59.9%	42
04-01-0897	WEATHER-MASTER XT 185 RED LF		60.6%	0
04-01-0904	WEATHER-MASTER XT 1505 ORANGE LF	370	56.9%	211
04-01-0906	WEATHER-MASTER XT285 BLUE LF		66.9%	0
04-01-0909	WEATHER-MASTER XT 469 BROWN LF	350	57.8%	202
04-01-0918	WEATHER-MASTER XT 021 ORANGE LF		60.0%	0
04-01-0919-	WEATHER-MASTER XT 485 RED LF		59.8%	0
04-01-0943	WEATHER-MASTER XT 201 RED LF	380	60.4%	230
04-01-0945	WEATHER-MASTER XT 102 YELLOW LF	730	57.0%	416
04-01-0951	WEATHER-MASTER XT 476 BROWN LF	1050	58.0%	609
04-01-0952	WEATHER-MASTER XT 187 RED LF	700	60.4%	423
04-01-0953	WEATHER-MASTER XT 108 YELLOW LF	350	61.6%	216
04-01-0957	WEATHER-MASTER XT 347 GREEN LF	175	60.8%	106
04-01-0963	WEATHER-MASTER XT REFLEX BLUE LF	350	65.7%	230
04-01-0970	WEATHER-MASTER XT 355 GREEN LF	700	59.2%	414
04-01-0994	WEATHER-MASTER XT LINE PROC MAGENTA LF	370	63.3%	234
04-01-1010	WEATHER-MASTER XT 172 ORANGE LF		56.6%	0
04-01-1049	WEATHER-MASTER XT 583 GREEN	70	58.7%	41
04-01-1109	WEATHER-MASTER XT 482 TAN		74.4%	0
04-01-1144	WEATHER-MASTER XT 348 GREEN LF		56.6%	0
04-01-1163	WEATHERMASTER XT 349 GREEN LF		57.0%	0
04-01-1164	WEATHER-MASTER XT 139 TAN LF		56.8%	0
04-01-1193	WEATHER-MASTER XT 511 PURPLE LF		57.3%	0
04-01-1249	WEATHERMASTER XT CYPRESS BLUE		59.8%	0
04-01-1257	WEATHER-MASTER XT 376 GREEN LF		59.8%	0
04-01-1263	WEATHER-MASTER XT 264 VIOLET LF		53.5%	0
04-01-1264	WEATHER-MASTER XT 506 BROWN LF		70.1%	0
04-01-1265	WEATHER-MASTER XT 608 YELLOW LF		57.6%	0
04-01-1290	WEATHER-MASTER XT PURPLE C LF	70	64.0%	45
04-01-1305	WEATHERMASTER XT 100 YELLOW		70.7%	0
04-01-1306	WEATHERMASTER XT 463 BROWN		65.5%	0
04-01-1307	WEATHERMASTER XT 465 BROWN		59.6%	0
04-01-1310	WEATHERMASTER XT 401 GRAY	70	67.3%	47
04-01-1337	WEATHERMASTER XT 267 PURPLE LF	140	61.5%	86
04-01-1338	WEATHERMASTER XT 362 GREEN LF	175	57.3%	100
04-01-1357	WEATHERMASTER XT 118 YELLOW LF		66.2%	0
04-01-1363	WEATHER-MASTER XT 7627 RED LF		57.3%	0
04-01-1373	WEATHERMASTER XT 4625 BROWN LF		54.1%	0

Reliance Packaging
155 Anderson St.
Aberdeen, NC 28315

CAJ, Inc. Georgetown, MA

March 2019 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
04-01-1377	WEATHERMASTER XT 357 GREEN LF		58.7%	0
04-01-1380	WEATHERMASTER XT PANTONE GREEN C LF		57.5%	0
04-01-1382	WEATHERMASTER XT 138 TAN LF		58.4%	0
04-01-1390	WEATHERMASTER XT WARM GRAY 7C LF		68.8%	0
04-01-1406	WEATHERMASTER XT 188 RED LF		59.8%	0
04-01-1407	WEATHERMASTER XT 470 BROWN LF	140	54.4%	76
04-01-1420	WEATHERMASTER XT 335 GREEN LF	694	58.8%	408
04-01-1470	WEATHERMASTER XT 470 BROWN LF		54.4%	0
04-01-1418	WEATHERMASTER XT 5185 PURPLE LF		62.9%	0
04-01-1427	WEATHERMASTER XT 3005 BLUE LF		57.0%	0
04-01-1428	WEATHERMASTER XT 342 GREEN LF		62.0%	0
04-01-1472	WEATHERMASTER XT 1595 ORANGE LF		58.3%	0
04-01-1484	WEATHERMASTER XT 173 RED LF		69.7%	0
04-01-1503	WEATHERMASTER XT 479 TAN LF		68.6%	0
04-01-1512	WEATHERMASTER XT 486 RED LF		70.3%	0
04-01-1525	WEATHERMASTER XT 1235 YELLOW LF		72.4%	0
04-01-1526	WEATHERMASTER XT 807 PURPLE LF		71.2%	0
04-01-1527	WEATHERMASTER XT 513 PURPLE LF		71.5%	0
04-01-1528	WEATHERMASTER XT 322 BLUE LF		56.8%	0
04-01-1529	WEATHERMASTER XT 2718 BLUE LF		67.8%	0
04-01-1530	WEATHERMASTER XT 141 YELLOW LF		64.9%	0
04-01-1531	WEATHERMASTER XT 126 BROWN LF		64.9%	0
04-01-1545	WEATHERMASTER XT 329 GREEN LF	380	68.5%	260
04-01-1603	WEATHERMASTER XT SUNSCAPES SPM VIOLET LF		56.9%	0
04-01-1604	WEATHERMASTER XT SUNSCAPES PB YELLOW LF		64.5%	0
04-01-1605	WEATHERMASTER XT SUNSCAPE RLR RED LF		57.5%	0
04-01-1606	WEATHERMASTER XT SUNSCAPES PS ORANGE LF		59.4%	0
04-01-1607	WEATHERMASTER XT SUNSCAPES PM PINK LF		59.1%	0
04-01-1608	WEATHERMASTER XT SUNSCAPES NSS GREEN LF		54.8%	0
04-01-1609	WEATHERMASTER XT SUNSCAPES DFR GRAY LF		71.3%	0
04-01-1610	WEATHERMASTER XT SUNSCAPES MMC BLUE LF		60.9%	0
04-01-1611	WEATHERMASTER XT SUNSCAPES PG GREEN XT		57.8%	0
04-01-1621	WEATHERMASTER XT 1935 RED LF		57.8%	0
04-01-1631	WEATHERMASTER XT 215 PINK LF		57.8%	0
04-01-1656	WEATHERMASTER XT 345 GREEN LF		69.2%	0
04-01-1716	WEATHERMASTER XT 368 GREEN LF		59.5%	0
04-01-1718	WEATHERMASTER XT 1245 YELLOW LF		53.3%	0
04-01-1727	WEATHERMASTER XT 269 VIOLET LF		29.3%	0
04-01-1728	WEATHERMASTER XT 240 PINK LF		57.9%	0
04-01-1729	WEATHERMASTER XT 334 GREEN LF		54.0%	0
04-01-1738	WEATHERMASTER XT 4695 BROWN LF		54.6%	0
04-01-1742	WEATHERMASTER XT 359 GREEN LF	740	66.6%	493

		Reliance Packaging		
		155 Anderson St. Aberdeen, NC 28315		
CAI, Inc. Georgetown, MA				
March 2019 VOC Summary				
Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
04-01-1747	WEATHERMASTER XT 224 PINK LF		65.8%	0
04-01-1748	WEATHERMASTER XT 228 RED LF		57.0%	0
04-01-1749	WEATHERMASTER XT 107 YELLOW LF		58.1%	0
04-01-1750	WEATHERMASTER XT 504 BURGANDY LF		56.6%	0
04-01-1758	WEATHERMASTER XT WARM GRAY 2C LF		71.2%	0
04-01-1759	WEATHERMASTER XT WARM GRAY 5C LF		71.0%	0
04-01-1760	WEATHERMASTER XT 343 GREEN LF		56.0%	0
04-01-1761	WEATHERMASTER XT 289 BLUE LF		53.9%	0
04-01-1777	WEATHERMASTER XT 428 GRAY LF		71.3%	0
04-01-1778	WEATHERMASTER XT 249 PURPLE LF		57.8%	0
04-01-1792	WEATHERMASTER XT 7568 BROWN LF		62.0%	0
98-0054	ARCOSOLVE PNP		100.0%	0
Total (lbs)		22634		11,819

Reliance Packaging
155 Anderson St.
Aberdeen, NC 28315

CAI, inc. Georgetown, MA

February 2019 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
01-1068	SOIL WHITE LO SLIP	12480	45.8%	5,712
01-1283	SOIL BLACK HI STR LO SLIP	2280	54.5%	1,243
01-1292	SOIL NON-SKID LACQUER LO SLIP		64.1%	0
01-2751	SOIL NON-SKID OPV		58.9%	0
04-01-0061	WEATHER-MASTER XT CYAN BLUE LF	108	59.9%	65
04-01-0897	WEATHER-MASTER XT 185 RED LF		60.6%	0
04-01-0904	WEATHER-MASTER XT 1505 ORANGE LF	350	56.9%	199
04-01-0906	WEATHER-MASTER XT285 BLUE LF	350	66.9%	234
04-01-0909	WEATHER-MASTER XT 469 BROWN LF	1050	57.8%	607
04-01-0918	WEATHER-MASTER XT 021 ORANGE LF		60.0%	0
04-01-0919-	WEATHER-MASTER XT 485 RED LF	350	59.8%	209
04-01-0943	WEATHER-MASTER XT 201 RED LF	350	60.4%	211
04-01-0945	WEATHER-MASTER XT 102 YELLOW LF	700	57.0%	399
04-01-0951	WEATHER-MASTER XT 476 BROWN LF	350	58.0%	203
04-01-0952	WEATHER-MASTER XT 187 RED LF		60.4%	0
04-01-0953	WEATHER-MASTER XT 108 YELLOW LF	350	61.6%	216
04-01-0963	WEATHER-MASTER XT REFLEX BLUE LF	700	65.7%	460
04-01-0970	WEATHER-MASTER XT 355 GREEN LF	350	59.2%	207
04-01-0994	WEATHER-MASTER XT LINE PROC MAGENTA LF	350	63.3%	222
04-01-1010	WEATHER-MASTER XT 172 ORANGE LF		56.6%	0
04-01-1049	WEATHER-MASTER XT 583 GREEN		58.7%	0
04-01-1109	WEATHER-MASTER XT 482 TAN		74.4%	0
04-01-1144	WEATHER-MASTER XT 348 GREEN LF	370	56.6%	209
04-01-1163	WEATHERMASTER XT 349 GREEN LF		57.0%	0
04-01-1164	WEATHER-MASTER XT 139 TAN LF	105	56.8%	60
04-01-1193	WEATHER-MASTER XT 511 PURPLE LF	70	57.3%	40
04-01-1249	WEATHERMASTER XT CYPRESS BLUE		59.8%	0
04-01-1257	WEATHER-MASTER XT 376 GREEN LF		59.8%	0
04-01-1263	WEATHER-MASTER XT 264 VIOLET LF		53.5%	0
04-01-1264	WEATHER-MASTER XT 506 BROWN LF		70.1%	0
04-01-1265	WEATHER-MASTER XT 608 YELLOW LF		57.6%	0
04-01-1305	WEATHERMASTER XT 100 YELLOW		70.7%	0
04-01-1306	WEATHERMASTER XT 463 BROWN		65.5%	0
04-01-1307	WEATHERMASTER XT 465 BROWN		59.6%	0
04-01-1357	WEATHERMASTER XT 118 YELLOW LF		66.2%	0
04-01-1363	WEATHER-MASTER XT 7627 RED LF	144	57.3%	83
04-01-1373	WEATHERMASTER XT 4625 BROWN LF		54.1%	0
04-01-1377	WEATHERMASTER XT 357 GREEN LF	72	58.7%	42
04-01-1380	WEATHERMASTER XT PANTONE GREEN C LF		57.5%	0
04-01-1382	WEATHERMASTER XT 138 TAN LF		58.4%	0
04-01-1390	WEATHERMASTER XT WARM GRAY 7C LF		68.8%	0
04-01-1406	WEATHERMASTER XT 188 RED LF		59.8%	0




Reliance Packaging
 155 Anderson St.
 Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

February 2019 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
04-01-1470	WEATHERMASTER XT 470 BROWN LF	70	54.4%	38
04-01-1418	WEATHERMASTER XT 5185 PURPLE LF		62.9%	0
04-01-1420	WEATHERMASTER XT 335 GREEN LF		58.8%	0
04-01-1427	WEATHERMASTER XT 3005 BLUE LF		57.0%	0
04-01-1428	WEATHERMASTER XT 342 GREEN LF		62.0%	0
04-01-1472	WEATHERMASTER XT 1595 ORANGE LF		58.3%	0
04-01-1484	WEATHERMASTER XT 173 RED LF		69.7%	0
04-01-1503	WEATHERMASTER XT 479 TAN LF		68.6%	0
04-01-1512	WEATHERMASTER XT 486 RED LF		70.3%	0
04-01-1525	WEATHERMASTER XT 1235 YELLOW LF	108	72.4%	78
04-01-1526	WEATHERMASTER XT 807 PURPLE LF		71.2%	0
04-01-1527	WEATHERMASTER XT 513 PURPLE LF		71.5%	0
04-01-1528	WEATHERMASTER XT 322 BLUE LF		56.8%	0
04-01-1529	WEATHERMASTER XT 2718 BLUE LF	36	67.8%	24
04-01-1530	WEATHERMASTER XT 141 YELLOW LF		64.9%	0
04-01-1531	WEATHERMASTER XT 126 BROWN LF		64.9%	0
04-01-1545	WEATHERMASTER XT 329 GREEN LF		68.5%	0
04-01-1603	WEATHERMASTER XT SUNSCAPES SPM VIOLET LF		56.9%	0
04-01-1604	WEATHERMASTER XT SUNSCAPES PB YELLOW LF		64.5%	0
04-01-1605	WEATHERMASTER XT SUNSCAPE RLR RED LF		57.5%	0
04-01-1606	WEATHERMASTER XT SUNSCAPES PS ORANGE LF		59.4%	0
04-01-1607	WEATHERMASTER XT SUNSCAPES PM PINK LF	72	59.1%	43
04-01-1608	WEATHERMASTER XT SUNSCAPES NSS GREEN LF		54.8%	0
04-01-1609	WEATHERMASTER XT SUNSCAPES DFR GRAY LF	36	71.3%	26
04-01-1610	WEATHERMASTER XT SUNSCAPES MMC BLUE LF	72	60.9%	44
04-01-1611	WEATHERMASTER XT SUNSCAPES PG GREEN XT		57.8%	0
04-01-1621	WEATHERMASTER XT 1935 RED LF		57.8%	0
04-01-1631	WEATHERMASTER XT 215 PINK LF		57.8%	0
04-01-1656	WEATHERMASTER XT 345 GREEN LF		69.2%	0
04-01-1716	WEATHERMASTER XT 368 GREEN LF		59.5%	0
04-01-1718	WEATHERMASTER XT 1245 YELLOW LF		53.3%	0
04-01-1727	WEATHERMASTER XT 269 VIOLET LF		29.3%	0
04-01-1728	WEATHERMASTER XT 240 PINK LF		57.9%	0
04-01-1729	WEATHERMASTER XT 334 GREEN LF		54.0%	0
04-01-1738	WEATHERMASTER XT 4695 BROWN LF		54.6%	0
04-01-1742	WEATHERMASTER XT 359 GREEN LF		66.6%	0
04-01-1747	WEATHERMASTER XT 224 PINK LF	72	65.8%	47
04-01-1748	WEATHERMASTER XT 228 RED LF		57.0%	0
04-01-1749	WEATHERMASTER XT 107 YELLOW LF		58.1%	0
04-01-1750	WEATHERMASTER XT 504 BURGANDY LF		56.6%	0
04-01-1758	WEATHERMASTER XT WARM GRAY 2C LF		71.2%	0
04-01-1759	WEATHERMASTER XT WARM GRAY 5C LF		71.0%	0

		Reliance Packaging		
		155 Anderson St. Aberdeen, NC 28315		
CAI, Inc. Georgetown, MA				
February 2019 VOC Summary				
Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
04-01-1760	WEATHERMASTER XT 343 GREEN LF		56.0%	0
04-01-1761	WEATHERMASTER XT 289 BLUE LF		53.9%	0
04-01-1777	WEATHERMASTER XT 428 GRAY LF		71.3%	0
04-01-1778	WEATHERMASTER XT 249 PURPLE LF		57.8%	0
04-01-1792	WEATHERMASTER XT 7568 BROWN LF	105	62.0%	65
98-0054	ARCOSOLVE PNP		100.0%	0
				0
Total (lbs)		21450		10,986



Reliance Packaging
 155 Anderson St.
 Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

January 2019 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
01-1068	SOIL WHITE LO SLIP	8640	45.8%	3,955
01-1283	SOIL BLACK HI STR LO SLIP	3040	54.5%	1,657
01-1292	SOIL NON-SKID LACQUER LO SLIP		64.1%	0
01-2751	SOIL NON-SKID OPV		58.9%	0
04-01-0061	WEATHER-MASTER XT CYAN BLUE LF		59.9%	0
04-01-0897	WEATHER-MASTER XT 185 RED LF		60.6%	0
04-01-0904	WEATHER-MASTER XT 1505 ORANGE LF		56.9%	0
04-01-0909	WEATHER-MASTER XT 469 BROWN LF		57.8%	0
04-01-0918	WEATHER-MASTER XT 021 ORANGE LF		60.0%	0
04-01-0919	WEATHER-MASTER XT 485 RED LF		59.8%	0
04-01-0943	WEATHER-MASTER XT 201 RED LF		60.4%	0
04-01-0945	WEATHER-MASTER XT 102 YELLOW LF	730	57.0%	416
04-01-0951	WEATHER-MASTER XT 476 BROWN LF	2260	58.0%	1,311
04-01-0952	WEATHER-MASTER XT 187 RED LF	380	60.4%	230
04-01-0953	WEATHER-MASTER XT 108 YELLOW LF		61.6%	0
04-01-0963	WEATHER-MASTER XT REFLEX BLUE LF		65.7%	0
04-01-0970	WEATHER-MASTER XT 355 GREEN LF	350	59.2%	207
04-01-0994	WEATHER-MASTER XT LINE PROC MAGENTA LF		63.3%	0
04-01-1010	WEATHER-MASTER XT 172 ORANGE LF	380	56.6%	215
04-01-1049	WEATHER-MASTER XT 583 GREEN		58.7%	0
04-01-1109	WEATHER-MASTER XT 482 TAN		74.4%	0
04-01-1163	WEATHERMASTER XT 349 GREEN LF		57.0%	0
04-01-1249	WEATHERMASTER XT CYPRESS BLUE		59.8%	0
04-01-1257	WEATHER-MASTER XT 376 GREEN LF		53.5%	0
04-01-1263	WEATHER-MASTER XT 264 VIOLET LF		70.1%	0
04-01-1264	WEATHER-MASTER XT 506 BROWN LF		57.6%	0
04-01-1265	WEATHER-MASTER XT 608 YELLOW LF		70.7%	0
04-01-1305	WEATHERMASTER XT 100 YELLOW		65.5%	0
04-01-1306	WEATHERMASTER XT 463 BROWN		59.6%	0
04-01-1307	WEATHERMASTER XT 465 BROWN		66.2%	0
04-01-1357	WEATHERMASTER XT 118 YELLOW LF		55.8%	0
04-01-1373	WEATHERMASTER XT 4625 BROWN LF		54.1%	0
04-01-1377	WEATHERMASTER XT 357 GREEN LF		58.7%	0
04-01-1380	WEATHERMASTER XT PANTONE GREEN C LF		57.5%	0
04-01-1382	WEATHERMASTER XT 138 TAN LF		58.4%	0
04-01-1390	WEATHERMASTER XT WARM GRAY 7C LF		68.8%	0
04-01-1406	WEATHERMASTER XT 188 RED LF		59.8%	0
04-01-1418	WEATHERMASTER XT 5185 PURPLE LF		62.9%	0
04-01-1420	WEATHERMASTER XT 335 GREEN LF	380	58.8%	223
04-01-1427	WEATHERMASTER XT 3005 BLUE LF		57.0%	0
04-01-1428	WEATHERMASTER XT 342 GREEN LF		62.0%	0
04-01-1472	WEATHERMASTER XT 1595 ORANGE LF		58.3%	0




Reliance Packaging
 155 Anderson St.
 Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

January 2019 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
04-01-1484	WEATHERMASTER XT 173 RED LF	111	69.7%	77
04-01-1503	WEATHERMASTER XT 479 TAN LF		68.6%	0
04-01-1512	WEATHERMASTER XT 486 RED LF		70.3%	0
04-01-1525	WEATHERMASTER XT 1235 YELLOW LF		72.4%	0
04-01-1526	WEATHERMASTER XT 807 PURPLE LF	72	71.2%	51
04-01-1527	WEATHERMASTER XT 513 PURPLE LF	108	71.5%	77
04-01-1528	WEATHERMASTER XT 322 BLUE LF		56.8%	0
04-01-1529	WEATHERMASTER XT 2718 BLUE LF		67.8%	0
04-01-1530	WEATHERMASTER XT 141 YELLOW LF		64.9%	0
04-01-1531	WEATHERMASTER XT 126 BROWN LF		64.9%	0
04-01-1545	WEATHERMASTER XT 329 GREEN LF		68.5%	0
04-01-1603	WEATHERMASTER XT SUNSCAPES SPM VIOLET LF		56.9%	0
04-01-1604	WEATHERMASTER XT SUNSCAPES PB YELLOW LF		64.5%	0
04-01-1605	WEATHERMASTER XT SUNSCAPE RLR RED LF		57.5%	0
04-01-1606	WEATHERMASTER XT SUNSCAPES PS ORANGE LF		59.4%	0
04-01-1607	WEATHERMASTER XT SUNSCAPES PM PINK LF		59.1%	0
04-01-1608	WEATHERMASTER XT SUNSCAPES NSS GREEN LF		54.8%	0
04-01-1609	WEATHERMASTER XT SUNSCAPES DFR GRAY LF		71.3%	0
04-01-1610	WEATHERMASTER XT SUNSCAPES MMC BLUE LF		60.9%	0
04-01-1611	WEATHERMASTER XT SUNSCAPES PG GREEN XT		57.8%	0
04-01-1621	WEATHERMASTER XT 1935 RED LF		57.8%	0
04-01-1631	WEATHERMASTER XT 215 PINK LF		57.8%	0
04-01-1656	WEATHERMASTER XT 345 GREEN LF		69.2%	0
04-01-1716	WEATHERMASTER XT 368 GREEN LF		59.5%	0
04-01-1718	WEATHERMASTER XT 1245 YELLOW LF		53.3%	0
04-01-1727	WEATHERMASTER XT 269 VIOLET LF		29.3%	0
04-01-1728	WEATHERMASTER XT 240 PINK LF		57.9%	0
04-01-1729	WEATHERMASTER XT 334 GREEN LF		54.0%	0
04-01-1738	WEATHERMASTER XT 4695 BROWN LF		54.6%	0
04-01-1742	WEATHERMASTER XT 359 GREEN LF		66.6%	0
04-01-1747	WEATHERMASTER XT 224 PINK LF		65.8%	0
04-01-1748	WEATHERMASTER XT 228 RED LF		57.0%	0
04-01-1749	WEATHERMASTER XT 107 YELLOW LF		58.1%	0
04-01-1750	WEATHERMASTER XT 504 BURGANDY LF		56.6%	0
04-01-1758	WEATHERMASTER XT WARM GRAY 2C LF		71.2%	0
04-01-1759	WEATHERMASTER XT WARM GRAY 5C LF		71.0%	0
04-01-1760	WEATHERMASTER XT 343 GREEN LF		56.0%	0
04-01-1761	WEATHERMASTER XT 289 BLUE LF		53.9%	0
04-01-1777	WEATHERMASTER XT 428 GRAY LF	140	71.3%	100
04-01-1778	WEATHERMASTER XT 249 PURPLE LF	140	57.8%	81
98-0054	ARCOSOLVE PNP		100.0%	0
				0

		Reliance Packaging		
		155 Anderson St. Aberdeen, NC 28315		
CAI, Inc. Georgetown, MA				
January 2019 VOC Summary				
Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
Total (lbs)		16731		8,600

Reliance Packaging
155 Anderson St.
Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

December 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
01-1068	SOIL WHITE LO SLIP	7680	45.8%	3,515
01-1283	SOIL BLACK HI STR LO SLIP	2280	54.5%	1,243
01-1292	SOIL NON-SKID LACQUER LO SLIP		64.1%	0
01-2751	SOIL NON-SKID OPV	1540	58.9%	907
04-01-0061	WEATHER-MASTER XT CYAN BLUE LF		59.9%	0
04-01-0897	WEATHER-MASTER XT 185 RED LF		60.6%	0
04-01-0904	WEATHER-MASTER XT 1505 ORANGE LF		56.9%	0
04-01-0909	WEATHER-MASTER XT 469 BROWN LF	700	57.8%	405
04-01-0918	WEATHER-MASTER XT 021 ORANGE LF	74	60.0%	44
04-01-0919	WEATHER-MASTER XT 485 RED LF		59.8%	0
04-01-0943	WEATHER-MASTER XT 201 RED LF	350	60.4%	211
04-01-0945	WEATHER-MASTER XT 102 YELLOW LF	350	57.0%	200
04-01-0951	WEATHER-MASTER XT 476 BROWN LF	1050	58.0%	609
04-01-0952	WEATHER-MASTER XT 187 RED LF	760	60.4%	459
04-01-0953	WEATHER-MASTER XT 108 YELLOW LF	350	61.6%	216
04-01-0963	WEATHER-MASTER XT REFLEX BLUE LF		65.7%	0
04-01-0970	WEATHER-MASTER XT 355 GREEN LF	350	59.2%	207
04-01-0994	WEATHER-MASTER XT LINE PROC MAGENTA LF		63.3%	0
04-01-1010	WEATHER-MASTER XT 172 ORANGE LF		56.6%	0
04-01-1049	WEATHER-MASTER XT 583 GREEN		58.7%	0
04-01-1109	WEATHER-MASTER XT 482 TAN		74.4%	0
04-01-1163	WEATHERMASTER XT 349 GREEN LF	74	57.0%	42
04-01-1249	WEATHERMASTER XT CYPRESS BLUE		59.8%	0
04-01-1257	WEATHER-MASTER XT 376 GREEN LF		53.5%	0
04-01-1263	WEATHER-MASTER XT 264 VIOLET LF		70.1%	0
04-01-1264	WEATHER-MASTER XT 506 BROWN LF		57.6%	0
04-01-1265	WEATHER-MASTER XT 608 YELLOW LF		70.7%	0
04-01-1305	WEATHERMASTER XT 100 YELLOW		65.5%	0
04-01-1306	WEATHERMASTER XT 463 BROWN		59.6%	0
04-01-1307	WEATHERMASTER XT 465 BROWN		66.2%	0
04-01-1357	WEATHERMASTER XT 118 YELLOW LF		55.8%	0
04-01-1373	WEATHERMASTER XT 4625 BROWN LF		54.1%	0
04-01-1377	WEATHERMASTER XT 357 GREEN LF		58.7%	0
04-01-1380	WEATHERMASTER XT PANTONE GREEN C LF		57.5%	0
04-01-1382	WEATHERMASTER XT 138 TAN LF		58.4%	0
04-01-1390	WEATHERMASTER XT WARM GRAY 7C LF		68.8%	0
04-01-1406	WEATHERMASTER XT 188 RED LF		59.8%	0
04-01-1418	WEATHERMASTER XT 5185 PURPLE LF		62.9%	0
04-01-1427	WEATHERMASTER XT 3005 BLUE LF		57.0%	0
04-01-1428	WEATHERMASTER XT 342 GREEN LF		62.0%	0
04-01-1472	WEATHERMASTER XT 1595 ORANGE LF	111	58.3%	65
04-01-1484	WEATHERMASTER XT 173 RED LF		69.7%	0



Reliance Packaging
 155 Anderson St.
 Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

December 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
04-01-1503	WEATHERMASTER XT 479 TAN LF		68.6%	0
04-01-1512	WEATHERMASTER XT 486 RED LF		70.3%	0
04-01-1525	WEATHERMASTER XT 1235 YELLOW LF		72.4%	0
04-01-1526	WEATHERMASTER XT 807 PURPLE LF	74	71.2%	53
04-01-1527	WEATHERMASTER XT 513 PURPLE LF		71.5%	0
04-01-1528	WEATHERMASTER XT 322 BLUE LF		56.8%	0
04-01-1529	WEATHERMASTER XT 2718 BLUE LF	111	67.8%	75
04-01-1530	WEATHERMASTER XT 141 YELLOW LF		64.9%	0
04-01-1531	WEATHERMASTER XT 126 BROWN LF		64.9%	0
04-01-1545	WEATHERMASTER XT 329 GREEN LF		68.5%	0
04-01-1603	WEATHERMASTER XT SUNSCAPES SPM VIOLET LF		56.9%	0
04-01-1604	WEATHERMASTER XT SUNSCAPES PB YELLOW LF		64.5%	0
04-01-1605	WEATHERMASTER XT SUNSCAPE RLR RED LF		57.5%	0
04-01-1606	WEATHERMASTER XT SUNSCAPES PS ORANGE LF		59.4%	0
04-01-1607	WEATHERMASTER XT SUNSCAPES PM PINK LF		59.1%	0
04-01-1608	WEATHERMASTER XT SUNSCAPES NSS GREEN LF		54.8%	0
04-01-1609	WEATHERMASTER XT SUNSCAPES DFR GRAY LF		71.3%	0
04-01-1610	WEATHERMASTER XT SUNSCAPES MMC BLUE LF		60.9%	0
04-01-1611	WEATHERMASTER XT SUNSCAPES PG GREEN XT		57.8%	0
04-01-1621	WEATHERMASTER XT 1935 RED LF		57.8%	0
04-01-1631	WEATHERMASTER XT 215 PINK LF		57.8%	0
04-01-1656	WEATHERMASTER XT 345 GREEN LF		69.2%	0
04-01-1716	WEATHERMASTER XT 368 GREEN LF		59.5%	0
04-01-1718	WEATHERMASTER XT 1245 YELLOW LF		53.3%	0
04-01-1727	WEATHERMASTER XT 269 VIOLET LF		29.3%	0
04-01-1728	WEATHERMASTER XT 240 PINK LF		57.9%	0
04-01-1729	WEATHERMASTER XT 334 GREEN LF		54.0%	0
04-01-1738	WEATHERMASTER XT 4695 BROWN LF		54.6%	0
04-01-1742	WEATHERMASTER XT 359 GREEN LF		66.6%	0
04-01-1747	WEATHERMASTER XT 224 PINK LF		65.8%	0
04-01-1748	WEATHERMASTER XT 228 RED LF		57.0%	0
04-01-1749	WEATHERMASTER XT 107 YELLOW LF		58.1%	0
04-01-1750	WEATHERMASTER XT 504 BURGANDY LF		56.6%	0
04-01-1758	WEATHERMASTER XT WARM GRAY 2C LF	370	71.2%	263
04-01-1759	WEATHERMASTER XT WARM GRAY 5C LF	140	71.0%	99
04-01-1760	WEATHERMASTER XT 343 GREEN LF	140	56.0%	78
04-01-1761	WEATHERMASTER XT 289 BLUE LF	105	53.9%	57
98-0054	ARCOSOLVE PNP	70	100.0%	70
				0
				0
				0
Total (lbs)		16,679		8,818




Reliance Packaging
155 Anderson St.
Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

November 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
01-1068	SOIL WHITE LO SLIP	8640	45.8%	3,955
01-1283	SOIL BLACK HI STR LO SLIP	1140	54.5%	621
01-1292	SOIL NON-SKID LACQUER LO SLIP		64.1%	0
01-2751	SOIL NON-SKID OPV		58.9%	0
04-01-0061	WEATHER-MASTER XT CYAN BLUE LF		59.9%	0
04-01-0897	WEATHER-MASTER XT 185 RED LF		60.6%	0
04-01-0904	WEATHER-MASTER XT 1505 ORANGE LF		56.9%	0
04-01-0909	WEATHER-MASTER XT 469 BROWN LF	740	57.8%	428
04-01-0918	WEATHER-MASTER XT 021 ORANGE LF	148	60.0%	89
04-01-0919	WEATHER-MASTER XT 485 RED LF		59.8%	0
04-01-0943	WEATHER-MASTER XT 201 RED LF		60.4%	0
04-01-0945	WEATHER-MASTER XT 102 YELLOW LF		57.0%	0
04-01-0951	WEATHER-MASTER XT 476 BROWN LF	1480	58.0%	858
04-01-0952	WEATHER-MASTER XT 187 RED LF		60.4%	0
04-01-0953	WEATHER-MASTER XT 108 YELLOW LF	370	61.6%	228
04-01-0963	WEATHER-MASTER XT REFLEX BLUE LF		65.7%	0
04-01-0970	WEATHER-MASTER XT 355 GREEN LF		59.2%	0
04-01-0994	WEATHER-MASTER XT LINE PROC MAGENTA LF	370	63.3%	234
04-01-1010	WEATHER-MASTER XT 172 ORANGE LF	350	56.6%	198
04-01-1049	WEATHER-MASTER XT 583 GREEN	148	58.7%	87
04-01-1109	WEATHER-MASTER XT 482 TAN	148	74.4%	110
04-01-1163	WEATHERMASTER XT 349 GREEN LF	148	57.0%	84
04-01-1249	WEATHERMASTER XT CYPRESS BLUE		59.8%	0
04-01-1257	WEATHER-MASTER XT 376 GREEN LF	380	53.5%	203
04-01-1263	WEATHER-MASTER XT 264 VIOLET LF		70.1%	0
04-01-1264	WEATHER-MASTER XT 506 BROWN LF		57.6%	0
04-01-1285	WEATHER-MASTER XT 608 YELLOW LF		70.7%	0
04-01-1305	WEATHERMASTER XT 100 YELLOW		65.5%	0
04-01-1306	WEATHERMASTER XT 463 BROWN		59.6%	0
04-01-1307	WEATHERMASTER XT 465 BROWN		66.2%	0
04-01-1357	WEATHERMASTER XT 118 YELLOW LF		55.8%	0
04-01-1373	WEATHERMASTER XT 4625 BROWN LF		54.1%	0
04-01-1377	WEATHERMASTER XT 357 GREEN LF		58.7%	0
04-01-1380	WEATHERMASTER XT PANTONE GREEN C LF		57.5%	0
04-01-1382	WEATHERMASTER XT 138 TAN LF		58.4%	0
04-01-1390	WEATHERMASTER XT WARM GRAY 7C LF		68.8%	0
04-01-1406	WEATHERMASTER XT 188 RED LF	111	59.8%	66
04-01-1418	WEATHERMASTER XT 5185 PURPLE LF	74	62.9%	47
04-01-1427	WEATHERMASTER XT 3005 BLUE LF		57.0%	0
04-01-1428	WEATHERMASTER XT 342 GREEN LF	140	62.0%	87
04-01-1472	WEATHERMASTER XT 1595 ORANGE LF		58.3%	0
04-01-1484	WEATHERMASTER XT 173 RED LF	82	69.7%	57

		Reliance Packaging 155 Anderson St. Aberdeen, NC 28315		
CAI, Inc. Georgetown, MA				
November 2018 VOC Summary				
Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
04-01-1503	WEATHERMASTER XT 479 TAN LF		68.6%	0
04-01-1512	WEATHERMASTER XT 486 RED LF		70.3%	0
04-01-1525	WEATHERMASTER XT 1235 YELLOW LF		72.4%	0
04-01-1526	WEATHERMASTER XT 807 PURPLE LF		71.2%	0
04-01-1527	WEATHERMASTER XT 513 PURPLE LF		71.5%	0
04-01-1528	WEATHERMASTER XT 322 BLUE LF		56.8%	0
04-01-1529	WEATHERMASTER XT 2718 BLUE LF		67.8%	0
04-01-1530	WEATHERMASTER XT 141 YELLOW LF		64.9%	0
04-01-1531	WEATHERMASTER XT 126 BROWN LF		64.9%	0
04-01-1545	WEATHERMASTER XT 329 GREEN LF	1400	68.5%	959
04-01-1603	WEATHERMASTER XT SUNSCAPES SPM VIOLET LF		56.9%	0
04-01-1604	WEATHERMASTER XT SUNSCAPES PB YELLOW LF		64.5%	0
04-01-1605	WEATHERMASTER XT SUNSCAPE RLR RED LF		57.5%	0
04-01-1606	WEATHERMASTER XT SUNSCAPES PS ORANGE LF		59.4%	0
04-01-1607	WEATHERMASTER XT SUNSCAPES PM PINK LF		59.1%	0
04-01-1608	WEATHERMASTER XT SUNSCAPES NSS GREEN LF		54.8%	0
04-01-1609	WEATHERMASTER XT SUNSCAPES DFR GRAY LF		71.3%	0
04-01-1610	WEATHERMASTER XT SUNSCAPES MMC BLUE LF		60.9%	0
04-01-1611	WEATHERMASTER XT SUNSCAPES PG GREEN XT		57.8%	0
04-01-1621	WEATHERMASTER XT 1935 RED LF		57.8%	0
04-01-1631	WEATHERMASTER XT 215 PINK LF		57.8%	0
04-01-1656	WEATHERMASTER XT 345 GREEN LF		69.2%	0
04-01-1716	WEATHERMASTER XT 368 GREEN LF	148	59.5%	88
04-01-1718	WEATHERMASTER XT 1245 YELLOW LF	140	53.3%	75
04-01-1727	WEATHERMASTER XT 269 VIOLET LF		29.3%	0
04-01-1728	WEATHERMASTER XT 240 PINK LF		57.9%	0
04-01-1729	WEATHERMASTER XT 334 GREEN LF		54.0%	0
04-01-1738	WEATHERMASTER XT 4695 BROWN LF		54.6%	0
04-01-1742	WEATHERMASTER XT 359 GREEN LF		66.6%	0
04-01-1747	WEATHERMASTER XT 224 PINK LF	180	65.8%	118
04-01-1748	WEATHERMASTER XT 228 RED LF	70	57.0%	40
04-01-1749	WEATHERMASTER XT 107 YELLOW LF	70	58.1%	41
04-01-1750	WEATHERMASTER XT 504 BURGANDY LF	74	56.6%	42
04-01-1758	WEATHERMASTER XT WARM GRAY 2C LF		71.2%	0
04-01-1759	WEATHERMASTER XT WARM GRAY 5C LF		71.0%	0
04-01-1760	WEATHERMASTER XT 343 GREEN LF		56.0%	0
04-01-1761	WEATHERMASTER XT 289 BLUE LF		53.9%	0
98-0054	ARCOSOLVE PNP		100.0%	0
				0
				0
				0
Total (lbs)		16,551		8,715




Reliance Packaging
 155 Anderson St.
 Aberdeen, NC 28315

CAI, inc. Georgetown, MA

October 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
01-1068	SOIL WHITE LO SLIP	9600	45.8%	4,394
01-1283	SOIL BLACK HI STR LO SLIP	2280	54.5%	1,243
01-1292	SOIL NON-SKID LACQUER LO SLIP		64.1%	0
01-2751	SOIL NON-SKID OPV		58.9%	0
04-01-0061	WEATHER-MASTER XT CYAN BLUE LF		59.9%	0
04-01-0897	WEATHER-MASTER XT 185 RED LF	380	60.6%	230
04-01-0904	WEATHER-MASTER XT 1505 ORANGE LF	350	56.9%	199
04-01-0909	WEATHER-MASTER XT 469 BROWN LF	350	57.8%	202
04-01-0918	WEATHER-MASTER XT 021 ORANGE LF	140	60.0%	84
04-01-0919	WEATHER-MASTER XT 485 RED LF	350	59.8%	209
04-01-0943	WEATHER-MASTER XT 201 RED LF	730	60.4%	441
04-01-0945	WEATHER-MASTER XT 102 YELLOW LF	350	57.0%	200
04-01-0951	WEATHER-MASTER XT 476 BROWN LF	1400	58.0%	812
04-01-0952	WEATHER-MASTER XT 187 RED LF	360	60.4%	217
04-01-0953	WEATHER-MASTER XT 108 YELLOW LF	720	61.6%	444
04-01-0963	WEATHER-MASTER XT REFLEX BLUE LF	730	65.7%	480
04-01-0970	WEATHER-MASTER XT 355 GREEN LF		59.2%	0
04-01-0994	WEATHER-MASTER XT LINE PROC MAGENTA LF		63.3%	0
04-01-1010	WEATHER-MASTER XT 172 ORANGE LF		56.6%	0
04-01-1049	WEATHER-MASTER XT 583 GREEN		58.7%	0
04-01-1109	WEATHER-MASTER XT 482 TAN		74.4%	0
04-01-1163	WEATHERMASTER XT 349 GREEN LF		57.0%	0
04-01-1249	WEATHERMASTER XT CYPRESS BLUE		59.8%	0
04-01-1257	WEATHER-MASTER XT 376 GREEN LF		53.5%	0
04-01-1263	WEATHER-MASTER XT 264 VIOLET LF		70.1%	0
04-01-1264	WEATHER-MASTER XT 506 BROWN LF	140	57.6%	81
04-01-1265	WEATHER-MASTER XT 608 YELLOW LF	108	70.7%	76
04-01-1305	WEATHERMASTER XT 100 YELLOW	108	65.5%	71
04-01-1306	WEATHERMASTER XT 463 BROWN	144	59.6%	86
04-01-1307	WEATHERMASTER XT 465 BROWN	144	66.2%	95
04-01-1357	WEATHERMASTER XT 118 YELLOW LF	210	55.8%	117
04-01-1373	WEATHERMASTER XT 4625 BROWN LF		54.1%	0
04-01-1377	WEATHERMASTER XT 357 GREEN LF		58.7%	0
04-01-1380	WEATHERMASTER XT PANTONE GREEN C LF		57.5%	0
04-01-1382	WEATHERMASTER XT 138 TAN LF		58.4%	0
04-01-1390	WEATHERMASTER XT WARM GRAY 7C LF		68.8%	0
04-01-1406	WEATHERMASTER XT 188 RED LF		59.8%	0
04-01-1418	WEATHERMASTER XT 5185 PURPLE LF		62.9%	0
04-01-1427	WEATHERMASTER XT 3005 BLUE LF	140	57.0%	80
04-01-1428	WEATHERMASTER XT 342 GREEN LF		62.0%	0
04-01-1472	WEATHERMASTER XT 1595 ORANGE LF		58.3%	0
04-01-1484	WEATHERMASTER XT 173 RED LF		69.7%	0

		Reliance Packaging 155 Anderson St. Aberdeen, NC 28315		
CAI, Inc. Georgetown, MA				
October 2018 VOC Summary				
Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
04-01-1503	WEATHERMASTER XT 479 TAN LF		68.6%	0
04-01-1512	WEATHERMASTER XT 486 RED LF	292	70.3%	205
04-01-1525	WEATHERMASTER XT 1235 YELLOW LF	251	72.4%	182
04-01-1526	WEATHERMASTER XT 807 PURPLE LF		71.2%	0
04-01-1527	WEATHERMASTER XT 513 PURPLE LF	140	71.5%	100
04-01-1528	WEATHERMASTER XT 322 BLUE LF		56.8%	0
04-01-1529	WEATHERMASTER XT 2718 BLUE LF		67.8%	0
04-01-1530	WEATHERMASTER XT 141 YELLOW LF		64.9%	0
04-01-1531	WEATHERMASTER XT 126 BROWN LF		64.9%	0
04-01-1545	WEATHERMASTER XT 329 GREEN LF		68.5%	0
04-01-1603	WEATHERMASTER XT SUNSCAPES SPM VIOLET LF		56.9%	0
04-01-1604	WEATHERMASTER XT SUNSCAPES PB YELLOW LF		64.5%	0
04-01-1605	WEATHERMASTER XT SUNSCAPE RLR RED LF	148	57.5%	85
04-01-1606	WEATHERMASTER XT SUNSCAPES PS ORANGE LF		59.4%	0
04-01-1607	WEATHERMASTER XT SUNSCAPES PM PINK LF		59.1%	0
04-01-1608	WEATHERMASTER XT SUNSCAPES NSS GREEN LF		54.8%	0
04-01-1609	WEATHERMASTER XT SUNSCAPES DFR GRAY LF		71.3%	0
04-01-1610	WEATHERMASTER XT SUNSCAPES MMC BLUE LF		60.9%	0
04-01-1611	WEATHERMASTER XT SUNSCAPES PG GREEN XT		57.8%	0
04-01-1621	WEATHERMASTER XT 1935 RED LF		57.8%	0
04-01-1631	WEATHERMASTER XT 215 PINK LF		57.8%	0
04-01-1656	WEATHERMASTER XT 345 GREEN LF	140	69.2%	97
04-01-1716	WEATHERMASTER XT 368 GREEN LF		59.5%	0
04-01-1718	WEATHERMASTER XT 1245 YELLOW LF	140	53.3%	75
04-01-1727	WEATHERMASTER XT 269 VIOLET LF		29.3%	0
04-01-1728	WEATHERMASTER XT 240 PINK LF		57.9%	0
04-01-1729	WEATHERMASTER XT 334 GREEN LF		54.0%	0
04-01-1738	WEATHERMASTER XT 4695 BROWN LF	68	54.6%	37
04-01-1742	WEATHERMASTER XT 359 GREEN LF	350	66.6%	233
04-01-1747	WEATHERMASTER XT 224 PINK LF		65.8%	0
04-01-1748	WEATHERMASTER XT 228 RED LF		57.0%	0
04-01-1749	WEATHERMASTER XT 107 YELLOW LF		58.1%	0
04-01-1750	WEATHERMASTER XT 504 BURGANDY LF		56.6%	0
04-01-1758	WEATHERMASTER XT WARM GRAY 2C LF		71.2%	0
04-01-1759	WEATHERMASTER XT WARM GRAY 5C LF		71.0%	0
04-01-1760	WEATHERMASTER XT 343 GREEN LF		56.0%	0
04-01-1761	WEATHERMASTER XT 289 BLUE LF		53.9%	0
98-0054	ARCOSOLVE PNP		100.0%	0
				0
				0
				0
Total (lbs)		20,263		10,774



Reliance Packaging
 155 Anderson St.
 Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

September 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
01-1068	SOIL WHITE LO SLIP	6240	45.8%	2,856
01-1283	SOIL BLACK HI STR LO SLIP	2660	54.5%	1,450
01-1292	SOIL NON-SKID LACQUER LO SLIP		64.1%	0
01-2751	SOIL NON-SKID OPV		58.9%	0
04-01-0061	WEATHER-MASTER XT CYAN BLUE LF		59.9%	0
04-01-0897	WEATHER-MASTER XT 185 RED LF		60.6%	0
04-01-0904	WEATHER-MASTER XT 1505 ORANGE LF		56.9%	0
04-01-0909	WEATHER-MASTER XT 469 BROWN LF		57.8%	0
04-01-0918	WEATHER-MASTER XT 021 ORANGE LF		60.0%	0
04-01-0919	WEATHER-MASTER XT 485 RED LF		59.8%	0
04-01-0943	WEATHER-MASTER XT 201 RED LF		60.4%	0
04-01-0945	WEATHER-MASTER XT 102 YELLOW LF		57.0%	0
04-01-0951	WEATHER-MASTER XT 476 BROWN LF	1224	58.0%	710
04-01-0952	WEATHER-MASTER XT 187 RED LF	740	60.4%	447
04-01-0953	WEATHER-MASTER XT 108 YELLOW LF	370	61.6%	228
04-01-0963	WEATHER-MASTER XT REFLEX BLUE LF		65.7%	0
04-01-0970	WEATHER-MASTER XT 355 GREEN LF		59.2%	0
04-01-0994	WEATHER-MASTER XT LINE PROC MAGENTA LF		63.3%	0
04-01-1010	WEATHER-MASTER XT 172 ORANGE LF		56.6%	0
04-01-1049	WEATHER-MASTER XT 583 GREEN	140	58.7%	82
04-01-1109	WEATHER-MASTER XT 482 TAN		74.4%	0
04-01-1163	WEATHERMASTER XT 349 GREEN LF		57.0%	0
04-01-1249	WEATHERMASTER XT CYPRESS BLUE		59.8%	0
04-01-1257	WEATHER-MASTER XT 376 GREEN LF		53.5%	0
04-01-1263	WEATHER-MASTER XT 264 VIOLET LF		70.1%	0
04-01-1264	WEATHER-MASTER XT 506 BROWN LF		57.6%	0
04-01-1265	WEATHER-MASTER XT 608 YELLOW LF		70.7%	0
04-01-1305	WEATHERMASTER XT 100 YELLOW		65.5%	0
04-01-1306	WEATHERMASTER XT 463 BROWN		59.6%	0
04-01-1307	WEATHERMASTER XT 465 BROWN		66.2%	0
04-01-1357	WEATHERMASTER XT 118 YELLOW LF		55.8%	0
04-01-1373	WEATHERMASTER XT 4625 BROWN LF		54.1%	0
04-01-1377	WEATHERMASTER XT 357 GREEN LF		58.7%	0
04-01-1380	WEATHERMASTER XT PANTONE GREEN C LF		57.5%	0
04-01-1382	WEATHERMASTER XT 138 TAN LF		58.4%	0
04-01-1390	WEATHERMASTER XT WARM GRAY 7C LF		68.8%	0
04-01-1406	WEATHERMASTER XT 188 RED LF		59.8%	0
04-01-1418	WEATHERMASTER XT 5185 PURPLE LF		62.9%	0
04-01-1427	WEATHERMASTER XT 3005 BLUE LF		57.0%	0
04-01-1428	WEATHERMASTER XT 342 GREEN LF		62.0%	0
04-01-1472	WEATHERMASTER XT 1595 ORANGE LF		58.3%	0
04-01-1484	WEATHERMASTER XT 173 RED LF		69.7%	0



Reliance Packaging
 155 Anderson St.
 Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

September 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
04-01-1503	WEATHERMASTER XT 479 TAN LF	114	68.6%	78
04-01-1512	WEATHERMASTER XT 486 RED LF		70.3%	0
04-01-1525	WEATHERMASTER XT 1235 YELLOW LF		72.4%	0
04-01-1526	WEATHERMASTER XT 807 PURPLE LF		71.2%	0
04-01-1527	WEATHERMASTER XT 513 PURPLE LF		71.5%	0
04-01-1528	WEATHERMASTER XT 322 BLUE LF		56.8%	0
04-01-1529	WEATHERMASTER XT 2718 BLUE LF		67.8%	0
04-01-1530	WEATHERMASTER XT 141 YELLOW LF		64.9%	0
04-01-1531	WEATHERMASTER XT 126 BROWN LF		64.9%	0
04-01-1545	WEATHERMASTER XT 329 GREEN LF		68.5%	0
04-01-1603	WEATHERMASTER XT SUNSCAPES SPM VIOLET LF		56.9%	0
04-01-1604	WEATHERMASTER XT SUNSCAPES PB YELLOW LF		64.5%	0
04-01-1605	WEATHERMASTER XT SUNSCAPE RLR RED LF		57.5%	0
04-01-1606	WEATHERMASTER XT SUNSCAPES PS ORANGE LF		59.4%	0
04-01-1607	WEATHERMASTER XT SUNSCAPES PM PINK LF		59.1%	0
04-01-1608	WEATHERMASTER XT SUNSCAPES NSS GREEN LF		54.8%	0
04-01-1609	WEATHERMASTER XT SUNSCAPES DFR GRAY LF		71.3%	0
04-01-1610	WEATHERMASTER XT SUNSCAPES MMC BLUE LF		60.9%	0
04-01-1611	WEATHERMASTER XT SUNSCAPES PG GREEN XT		57.8%	0
04-01-1621	WEATHERMASTER XT 1935 RED LF		57.8%	0
04-01-1631	WEATHERMASTER XT 215 PINK LF		57.8%	0
04-01-1656	WEATHERMASTER XT 345 GREEN LF		69.2%	0
04-01-1716	WEATHERMASTER XT 368 GREEN LF		59.5%	0
04-01-1718	WEATHERMASTER XT 1245 YELLOW LF		53.3%	0
04-01-1727	WEATHERMASTER XT 269 VIOLET LF	70	29.3%	21
04-01-1728	WEATHERMASTER XT 240 PINK LF	70	57.9%	41
04-01-1729	WEATHERMASTER XT 334 GREEN LF	70	54.0%	38
04-01-1738	WEATHERMASTER XT 4695 BROWN LF		54.6%	0
04-01-1742	WEATHERMASTER XT 359 GREEN LF		66.6%	0
04-01-1747	WEATHERMASTER XT 224 PINK LF		65.8%	0
04-01-1748	WEATHERMASTER XT 228 RED LF		57.0%	0
04-01-1749	WEATHERMASTER XT 107 YELLOW LF		58.1%	0
04-01-1750	WEATHERMASTER XT 504 BURGANDY LF		56.6%	0
04-01-1758	WEATHERMASTER XT WARM GRAY 2C LF		71.2%	0
04-01-1759	WEATHERMASTER XT WARM GRAY 5C LF		71.0%	0
04-01-1760	WEATHERMASTER XT 343 GREEN LF		56.0%	0
04-01-1761	WEATHERMASTER XT 289 BLUE LF		53.9%	0
98-0054	ARCOSOLVE PNP		100.0%	0
				0
				0
				0
Total (lbs)		11,698		5,950

Reliance Packaging
155 Anderson St.
Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

August 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
01-1068	SOIL WHITE LO SLIP	6720	45.8%	3,076
01-1283	SOIL BLACK HI STR LO SLIP	1900	54.5%	1,038
01-1292	SOIL NON-SKID LACQUER LO SLIP		64.1%	0
01-2751	SOIL NON-SKID OPV	770	58.9%	454
04-01-0061	WEATHER-MASTER XT CYAN BLUE LF		59.9%	0
04-01-0897	WEATHER-MASTER XT 185 RED LF		60.6%	0
04-01-0904	WEATHER-MASTER XT 1505 ORANGE LF		56.9%	0
04-01-0909	WEATHER-MASTER XT 469 BROWN LF		57.8%	0
04-01-0918	WEATHER-MASTER XT 021 ORANGE LF		60.0%	0
04-01-0919	WEATHER-MASTER XT 485 RED LF		59.8%	0
04-01-0943	WEATHER-MASTER XT 201 RED LF		60.4%	0
04-01-0945	WEATHER-MASTER XT 102 YELLOW LF		57.0%	0
04-01-0951	WEATHER-MASTER XT 476 BROWN LF	1400	58.0%	812
04-01-0952	WEATHER-MASTER XT 187 RED LF	370	60.4%	223
04-01-0953	WEATHER-MASTER XT 108 YELLOW LF		61.6%	0
04-01-0963	WEATHER-MASTER XT REFLEX BLUE LF		65.7%	0
04-01-0970	WEATHER-MASTER XT 355 GREEN LF		59.2%	0
04-01-0994	WEATHER-MASTER XT LINE PROC MAGENTA LF		63.3%	0
04-01-1010	WEATHER-MASTER XT 172 ORANGE LF		56.6%	0
04-01-1049	WEATHER-MASTER XT 583 GREEN		58.7%	0
04-01-1109	WEATHER-MASTER XT 482 TAN		74.4%	0
04-01-1163	WEATHERMASTER XT 349 GREEN LF		57.0%	0
04-01-1249	WEATHERMASTER XT CYPRESS BLUE		59.8%	0
04-01-1257	WEATHER-MASTER XT 376 GREEN LF		53.5%	0
04-01-1263	WEATHER-MASTER XT 264 VIOLET LF		70.1%	0
04-01-1264	WEATHER-MASTER XT 506 BROWN LF	170	57.6%	98
04-01-1265	WEATHER-MASTER XT 608 YELLOW LF		70.7%	0
04-01-1305	WEATHERMASTER XT 100 YELLOW	108	65.5%	71
04-01-1306	WEATHERMASTER XT 463 BROWN	144	59.6%	86
04-01-1307	WEATHERMASTER XT 465 BROWN	144	66.2%	95
04-01-1357	WEATHERMASTER XT 118 YELLOW LF		55.8%	0
04-01-1373	WEATHERMASTER XT 4625 BROWN LF		54.1%	0
04-01-1377	WEATHERMASTER XT 357 GREEN LF		58.7%	0
04-01-1380	WEATHERMASTER XT PANTONE GREEN C LF	350	57.5%	201
04-01-1382	WEATHERMASTER XT 138 TAN LF		58.4%	0
04-01-1390	WEATHERMASTER XT WARM GRAY 7C LF		68.8%	0
04-01-1406	WEATHERMASTER XT 188 RED LF		59.8%	0
04-01-1418	WEATHERMASTER XT 5185 PURPLE LF		62.9%	0
04-01-1427	WEATHERMASTER XT 3005 BLUE LF		57.0%	0
04-01-1428	WEATHERMASTER XT 342 GREEN LF		62.0%	0
04-01-1472	WEATHERMASTER XT 1595 ORANGE LF		58.3%	0
04-01-1484	WEATHERMASTER XT 173 RED LF		69.7%	0



Reliance Packaging
 155 Anderson St.
 Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

August 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
04-01-1503	WEATHERMASTER XT 479 TAN LF		68.6%	0
04-01-1512	WEATHERMASTER XT 486 RED LF		70.3%	0
04-01-1525	WEATHERMASTER XT 1235 YELLOW LF	144	72.4%	104
04-01-1526	WEATHERMASTER XT 807 PURPLE LF		71.2%	0
04-01-1527	WEATHERMASTER XT 513 PURPLE LF		71.5%	0
04-01-1528	WEATHERMASTER XT 322 BLUE LF	140	56.8%	80
04-01-1529	WEATHERMASTER XT 2718 BLUE LF		67.8%	0
04-01-1530	WEATHERMASTER XT 141 YELLOW LF		64.9%	0
04-01-1531	WEATHERMASTER XT 126 BROWN LF		64.9%	0
04-01-1545	WEATHERMASTER XT 329 GREEN LF		68.5%	0
04-01-1603	WEATHERMASTER XT SUNSCAPES SPM VIOLET LF		56.9%	0
04-01-1604	WEATHERMASTER XT SUNSCAPES PB YELLOW LF		64.5%	0
04-01-1605	WEATHERMASTER XT SUNSCAPE RLR RED LF		57.5%	0
04-01-1606	WEATHERMASTER XT SUNSCAPES PS ORANGE LF		59.4%	0
04-01-1607	WEATHERMASTER XT SUNSCAPES PM PINK LF		59.1%	0
04-01-1608	WEATHERMASTER XT SUNSCAPES NSS GREEN	144	54.8%	79
04-01-1609	WEATHERMASTER XT SUNSCAPES DFR GRAY LF		71.3%	0
04-01-1610	WEATHERMASTER XT SUNSCAPES MMC BLUE LF		60.9%	0
04-01-1611	WEATHERMASTER XT SUNSCAPES PG GREEN XT		57.8%	0
04-01-1621	WEATHERMASTER XT 1935 RED LF		57.8%	0
04-01-1631	WEATHERMASTER XT 215 PINK LF		57.8%	0
04-01-1656	WEATHERMASTER XT 345 GREEN LF		69.2%	0
04-01-1716	WEATHERMASTER XT 368 GREEN LF	180	59.5%	107
04-01-1718	WEATHERMASTER XT 1245 YELLOW LF	144	53.3%	77
04-01-1727	WEATHERMASTER XT 269 VIOLET LF		29.3%	0
04-01-1728	WEATHERMASTER XT 240 PINK LF		57.9%	0
04-01-1729	WEATHERMASTER XT 334 GREEN LF		54.0%	0
04-01-1738	WEATHERMASTER XT 4695 BROWN LF		54.6%	0
04-01-1742	WEATHERMASTER XT 359 GREEN LF		66.8%	0
04-01-1747	WEATHERMASTER XT 224 PINK LF		65.8%	0
04-01-1748	WEATHERMASTER XT 228 RED LF		57.0%	0
04-01-1749	WEATHERMASTER XT 107 YELLOW LF		58.1%	0
04-01-1750	WEATHERMASTER XT 504 BURGANDY LF		56.6%	0
04-01-1758	WEATHERMASTER XT WARM GRAY 2C LF		71.2%	0
04-01-1759	WEATHERMASTER XT WARM GRAY 5C LF		71.0%	0
04-01-1760	WEATHERMASTER XT 343 GREEN LF		56.0%	0
04-01-1761	WEATHERMASTER XT 289 BLUE LF		53.9%	0
98-0054	ARCOSOLVE PNP		100.0%	0
				0
				0
				0
Total (lbs)		12,828		6,598



Reliance Packaging
 155 Anderson St.
 Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

July 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
01-1068	SOIL WHITE LO SLIP	3840	45.8%	1,758
01-1283	SOIL BLACK HI STR LO SLIP	648	54.5%	353
01-1292	SOIL NON-SKID LACQUER LO SLIP		64.1%	0
01-2751	SOIL NON-SKID OPV		58.9%	0
04-01-0061	WEATHER-MASTER XT CYAN BLUE LF		59.9%	0
04-01-0897	WEATHER-MASTER XT 185 RED LF		60.6%	0
04-01-0904	WEATHER-MASTER XT 1505 ORANGE LF		56.9%	0
04-01-0909	WEATHER-MASTER XT 469 BROWN LF		57.8%	0
04-01-0918	WEATHER-MASTER XT 021 ORANGE LF		60.0%	0
04-01-0919-	WEATHER-MASTER XT 485 RED LF		59.8%	0
04-01-0943	WEATHER-MASTER XT 201 RED LF		60.4%	0
04-01-0945	WEATHER-MASTER XT 102 YELLOW LF		57.0%	0
04-01-0951	WEATHER-MASTER XT 476 BROWN LF	740	58.0%	429
04-01-0952	WEATHER-MASTER XT 187 RED LF	740	60.4%	447
04-01-0953	WEATHER-MASTER XT 108 YELLOW LF	370	61.6%	228
04-01-0963	WEATHER-MASTER XT REFLEX BLUE LF		65.7%	0
04-01-0970	WEATHER-MASTER XT 355 GREEN LF	370	59.2%	219
04-01-0994	WEATHER-MASTER XT LINE PROC MAGENTA LF		63.3%	0
04-01-1010	WEATHER-MASTER XT 172 ORANGE LF		56.6%	0
04-01-1049	WEATHER-MASTER XT 583 GREEN		58.7%	0
04-01-1109	WEATHER-MASTER XT 482 TAN		74.4%	0
04-01-1163	WEATHERMASTER XT 349 GREEN LF		57.0%	0
04-01-1249	WEATHERMASTER XT CYPRESS BLUE		59.8%	0
04-01-1257	WEATHER-MASTER XT 376 GREEN LF		53.5%	0
04-01-1263	WEATHER-MASTER XT 264 VIOLET LF		70.1%	0
04-01-1264	WEATHER-MASTER XT 506 BROWN LF		57.6%	0
04-01-1265	WEATHER-MASTER XT 608 YELLOW LF		70.7%	0
04-01-1305	WEATHERMASTER XT 100 YELLOW		65.5%	0
04-01-1306	WEATHERMASTER XT 463 BROWN		59.6%	0
04-01-1307	WEATHERMASTER XT 465 BROWN		66.2%	0
04-01-1357	WEATHERMASTER XT 118 YELLOW LF		55.8%	0
04-01-1373	WEATHERMASTER XT 4625 BROWN LF		54.1%	0
04-01-1377	WEATHERMASTER XT 357 GREEN LF		58.7%	0
04-01-1380	WEATHERMASTER XT PANTONE GREEN C LF		57.5%	0
04-01-1382	WEATHERMASTER XT 138 TAN LF		58.4%	0
04-01-1390	WEATHERMASTER XT WARM GRAY 7C LF		68.8%	0
04-01-1406	WEATHERMASTER XT 188 RED LF		59.8%	0
04-01-1418	WEATHERMASTER XT 5185 PURPLE LF		62.9%	0
04-01-1427	WEATHERMASTER XT 3005 BLUE LF		57.0%	0
04-01-1428	WEATHERMASTER XT 342 GREEN LF		62.0%	0
04-01-1472	WEATHERMASTER XT 1595 ORANGE LF		58.3%	0
04-01-1484	WEATHERMASTER XT 173 RED LF		69.7%	0



Reliance Packaging
 155 Anderson St.
 Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

July 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
04-01-1503	WEATHERMASTER XT 479 TAN LF		68.6%	0
04-01-1512	WEATHERMASTER XT 486 RED LF		70.3%	0
04-01-1525	WEATHERMASTER XT 1235 YELLOW LF		72.4%	0
04-01-1526	WEATHERMASTER XT 807 PURPLE LF		71.2%	0
04-01-1527	WEATHERMASTER XT 513 PURPLE LF		71.5%	0
04-01-1528	WEATHERMASTER XT 322 BLUE LF		56.8%	0
04-01-1529	WEATHERMASTER XT 2718 BLUE LF		67.8%	0
04-01-1530	WEATHERMASTER XT 141 YELLOW LF	740	64.9%	480
04-01-1531	WEATHERMASTER XT 126 BROWN LF	1480	64.9%	961
04-01-1545	WEATHERMASTER XT 329 GREEN LF		68.5%	0
04-01-1603	WEATHERMASTER XT SUNSCAPES SPM VIOLET LF		56.9%	0
04-01-1604	WEATHERMASTER XT SUNSCAPES PB YELLOW LF		64.5%	0
04-01-1605	WEATHERMASTER XT SUNSCAPE RLR RED LF		57.5%	0
04-01-1606	WEATHERMASTER XT SUNSCAPES PS ORANGE LF		59.4%	0
04-01-1607	WEATHERMASTER XT SUNSCAPES PM PINK LF		59.1%	0
04-01-1608	WEATHERMASTER XT SUNSCAPES NSS GREEN LF		54.8%	0
04-01-1609	WEATHERMASTER XT SUNSCAPES DFR GRAY LF		71.3%	0
04-01-1610	WEATHERMASTER XT SUNSCAPES MMC BLUE LF		60.9%	0
04-01-1611	WEATHERMASTER XT SUNSCAPES PG GREEN XT		57.8%	0
04-01-1621	WEATHERMASTER XT 1935 RED LF		57.8%	0
04-01-1631	WEATHERMASTER XT 215 PINK LF		57.8%	0
04-01-1656	WEATHERMASTER XT 345 GREEN LF		69.2%	0
04-01-1716	WEATHERMASTER XT 368 GREEN LF		59.5%	0
04-01-1718	WEATHERMASTER XT 1245 YELLOW LF		53.3%	0
04-01-1727	WEATHERMASTER XT 269 VIOLET LF		29.3%	0
04-01-1728	WEATHERMASTER XT 240 PINK LF		57.9%	0
04-01-1729	WEATHERMASTER XT 334 GREEN LF		54.0%	0
04-01-1738	WEATHERMASTER XT 4695 BROWN LF		54.6%	0
04-01-1742	WEATHERMASTER XT 359 GREEN LF		66.6%	0
04-01-1747	WEATHERMASTER XT 224 PINK LF		65.8%	0
04-01-1748	WEATHERMASTER XT 228 RED LF		57.0%	0
04-01-1749	WEATHERMASTER XT 107 YELLOW LF		58.1%	0
04-01-1750	WEATHERMASTER XT 504 BURGANDY LF		56.6%	0
04-01-1758	WEATHERMASTER XT WARM GRAY 2C LF		71.2%	0
04-01-1759	WEATHERMASTER XT WARM GRAY 5C LF		71.0%	0
04-01-1760	WEATHERMASTER XT 343 GREEN LF		56.0%	0
04-01-1761	WEATHERMASTER XT 289 BLUE LF		53.9%	0
98-0054	ARCOSOLVE PNP	70	100.0%	70
				0
				0
				0
Total (lbs)		8,998		4,945



Reliance Packaging
155 Anderson St.
Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

June 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
01-1068	SOIL WHITE LO SLIP	3840	45.8%	1,758
01-1283	SOIL BLACK HI STR LO SLIP	1900	54.5%	1,036
01-1292	SOIL NON-SKID LACQUER LO SLIP		64.1%	0
01-2751	SOIL NON-SKID OPV		58.9%	0
04-01-0061	WEATHER-MASTER XT CYAN BLUE LF		59.9%	0
04-01-0897	WEATHER-MASTER XT 185 RED LF	370	60.6%	224
04-01-0904	WEATHER-MASTER XT 1505 ORANGE LF		56.9%	0
04-01-0909	WEATHER-MASTER XT 469 BROWN LF		57.8%	0
04-01-0918	WEATHER-MASTER XT 021 ORANGE LF		60.0%	0
04-01-0919-	WEATHER-MASTER XT 485 RED LF		59.8%	0
04-01-0943	WEATHER-MASTER XT 201 RED LF		60.4%	0
04-01-0945	WEATHER-MASTER XT 102 YELLOW LF	1480	57.0%	844
04-01-0951	WEATHER-MASTER XT 476 BROWN LF	740	58.0%	429
04-01-0952	WEATHER-MASTER XT 187 RED LF		60.4%	0
04-01-0953	WEATHER-MASTER XT 108 YELLOW LF		61.6%	0
04-01-0963	WEATHER-MASTER XT REFLEX BLUE LF	740	65.7%	486
04-01-0970	WEATHER-MASTER XT 355 GREEN LF	370	59.2%	219
04-01-0994	WEATHER-MASTER XT LINE PROC MAGENTA LF		63.3%	0
04-01-1010	WEATHER-MASTER XT 172 ORANGE LF		56.6%	0
04-01-1049	WEATHER-MASTER XT 583 GREEN		58.7%	0
04-01-1109	WEATHER-MASTER XT 482 TAN		74.4%	0
04-01-1163	WEATHERMASTER XT 349 GREEN LF		57.0%	0
04-01-1249	WEATHERMASTER XT CYPRESS BLUE		59.8%	0
04-01-1257	WEATHER-MASTER XT 376 GREEN LF		53.5%	0
04-01-1263	WEATHER-MASTER XT 264 VIOLET LF		70.1%	0
04-01-1264	WEATHER-MASTER XT 506 BROWN LF		57.6%	0
04-01-1265	WEATHER-MASTER XT 608 YELLOW LF		70.7%	0
04-01-1305	WEATHERMASTER XT 100 YELLOW		65.5%	0
04-01-1306	WEATHERMASTER XT 463 BROWN		59.6%	0
04-01-1307	WEATHERMASTER XT 465 BROWN		66.2%	0
04-01-1357	WEATHERMASTER XT 118 YELLOW LF		55.8%	0
04-01-1373	WEATHERMASTER XT 4625 BROWN LF		54.1%	0
04-01-1377	WEATHERMASTER XT 357 GREEN LF		58.7%	0
04-01-1380	WEATHERMASTER XT PANTONE GREEN C LF		57.5%	0
04-01-1382	WEATHERMASTER XT 138 TAN LF		58.4%	0
04-01-1390	WEATHERMASTER XT WARM GRAY 7C LF		68.8%	0
04-01-1406	WEATHERMASTER XT 188 RED LF		59.8%	0
04-01-1418	WEATHERMASTER XT 5185 PURPLE LF		62.9%	0
04-01-1427	WEATHERMASTER XT 3005 BLUE LF		57.0%	0
04-01-1428	WEATHERMASTER XT 342 GREEN LF		62.0%	0
04-01-1472	WEATHERMASTER XT 1595 ORANGE LF		58.3%	0
04-01-1484	WEATHERMASTER XT 173 RED LF		69.7%	0



Reliance Packaging
 155 Anderson St.
 Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

June 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
04-01-1503	WEATHERMASTER XT 479 TAN LF		68.6%	0
04-01-1512	WEATHERMASTER XT 486 RED LF		70.3%	0
04-01-1525	WEATHERMASTER XT 1235 YELLOW LF		72.4%	0
04-01-1526	WEATHERMASTER XT 807 PURPLE LF		71.2%	0
04-01-1527	WEATHERMASTER XT 513 PURPLE LF		71.5%	0
04-01-1528	WEATHERMASTER XT 322 BLUE LF		56.8%	0
04-01-1529	WEATHERMASTER XT 2718 BLUE LF		67.8%	0
04-01-1530	WEATHERMASTER XT 141 YELLOW LF		64.9%	0
04-01-1531	WEATHERMASTER XT 126 BROWN LF	740	64.9%	480
04-01-1545	WEATHERMASTER XT 329 GREEN LF	1480	68.5%	1,014
04-01-1603	WEATHERMASTER XT SUNSCAPES SPM VIOLET LF		56.9%	0
04-01-1604	WEATHERMASTER XT SUNSCAPES PB YELLOW LF		64.5%	0
04-01-1605	WEATHERMASTER XT SUNSCAPE RLR RED LF		57.5%	0
04-01-1606	WEATHERMASTER XT SUNSCAPES PS ORANGE LF		59.4%	0
04-01-1607	WEATHERMASTER XT SUNSCAPES PM PINK LF		59.1%	0
04-01-1608	WEATHERMASTER XT SUNSCAPES NSS GREEN LF		54.8%	0
04-01-1609	WEATHERMASTER XT SUNSCAPES DFR GRAY LF		71.3%	0
04-01-1610	WEATHERMASTER XT SUNSCAPES MMC BLUE LF		60.9%	0
04-01-1611	WEATHERMASTER XT SUNSCAPES PG GREEN XT		57.8%	0
04-01-1621	WEATHERMASTER XT 1935 RED LF		57.8%	0
04-01-1631	WEATHERMASTER XT 215 PINK LF		57.8%	0
04-01-1656	WEATHERMASTER XT 345 GREEN LF		69.2%	0
04-01-1716	WEATHERMASTER XT 368 GREEN LF		59.5%	0
04-01-1718	WEATHERMASTER XT 1245 YELLOW LF		53.3%	0
04-01-1727	WEATHERMASTER XT 269 VIOLET LF		29.3%	0
04-01-1728	WEATHERMASTER XT 240 PINK LF		57.9%	0
04-01-1729	WEATHERMASTER XT 334 GREEN LF		54.0%	0
04-01-1738	WEATHERMASTER XT 4695 BROWN LF		54.6%	0
04-01-1742	WEATHERMASTER XT 359 GREEN LF		66.6%	0
04-01-1747	WEATHERMASTER XT 224 PINK LF		65.8%	0
04-01-1748	WEATHERMASTER XT 228 RED LF		57.0%	0
04-01-1749	WEATHERMASTER XT 107 YELLOW LF		58.1%	0
04-01-1750	WEATHERMASTER XT 504 BURGANDY LF		56.6%	0
04-01-1758	WEATHERMASTER XT WARM GRAY 2C LF		71.2%	0
04-01-1759	WEATHERMASTER XT WARM GRAY 5C LF		71.0%	0
04-01-1760	WEATHERMASTER XT 343 GREEN LF		56.0%	0
04-01-1761	WEATHERMASTER XT 289 BLUE LF		53.9%	0
98-0054	ARCOSOLVE PNP		100.0%	0
				0
				0
				0
Total (lbs)		11,660		6,489



Reliance Packaging
 155 Anderson St.
 Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

May 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
01-1068	SOIL WHITE LO SLIP	6720	45.8%	3,076
01-1283	SOIL BLACK HI STR LO SLIP	1520	54.5%	828
01-1292	SOIL NON-SKID LACQUER LO SLIP		64.1%	0
01-2751	SOIL NON-SKID OPV		58.9%	0
04-01-0061	WEATHER-MASTER XT CYAN BLUE LF		59.9%	0
04-01-0897	WEATHER-MASTER XT 185 RED LF		60.6%	0
04-01-0904	WEATHER-MASTER XT 1505 ORANGE LF		56.9%	0
04-01-0906	WEATHER-MASTER XT285 BLUE LF		66.9%	0
04-01-0909	WEATHER-MASTER XT 469 BROWN LF	360	57.8%	208
04-01-0918	WEATHER-MASTER XT 021 ORANGE LF		60.0%	0
04-01-0919	WEATHER-MASTER XT 485 RED LF	350	59.8%	209
04-01-0943	WEATHER-MASTER XT 201 RED LF		60.4%	0
04-01-0945	WEATHER-MASTER XT 102 YELLOW LF	360	57.0%	205
04-01-0951	WEATHER-MASTER XT 476 BROWN LF	1060	58.0%	615
04-01-0952	WEATHER-MASTER XT 187 RED LF		60.4%	0
04-01-0953	WEATHER-MASTER XT 108 YELLOW LF	360	61.6%	222
04-01-0957	WEATHER-MASTER XT 347 GREEN LF		60.8%	0
04-01-0963	WEATHER-MASTER XT REFLEX BLUE LF	140	65.7%	92
04-01-0970	WEATHER-MASTER XT 355 GREEN LF		59.2%	0
04-01-0994	WEATHER-MASTER XT LINE PROC MAGENTA LF		63.3%	0
04-01-1010	WEATHER-MASTER XT 172 ORANGE LF	380	56.6%	215
04-01-1049	WEATHER-MASTER XT 583 GREEN		58.7%	0
04-01-1109	WEATHER-MASTER XT 482 TAN	140	74.4%	104
04-01-1144	WEATHER-MASTER XT 348 GREEN LF		56.6%	0
04-01-1163	WEATHERMASTER XT 349 GREEN LF		57.0%	0
04-01-1164	WEATHER-MASTER XT 139 TAN LF		56.8%	0
04-01-1193	WEATHER-MASTER XT 511 PURPLE LF		57.3%	0
04-01-1249	WEATHERMASTER XT CYPRESS BLUE		59.8%	0
04-01-1257	WEATHER-MASTER XT 376 GREEN LF		59.8%	0
04-01-1263	WEATHER-MASTER XT 264 VIOLET LF		53.5%	0
04-01-1264	WEATHER-MASTER XT 506 BROWN LF		70.1%	0
04-01-1265	WEATHER-MASTER XT 608 YELLOW LF		57.6%	0
04-01-1290	WEATHER-MASTER XT PURPLE C LF		64.0%	0
04-01-1305	WEATHERMASTER XT 100 YELLOW		70.7%	0
04-01-1306	WEATHERMASTER XT 463 BROWN		65.5%	0
04-01-1307	WEATHERMASTER XT 465 BROWN		59.6%	0
04-01-1310	WEATHERMASTER XT 401 GRAY		67.3%	0
04-01-1337	WEATHERMASTER XT 267 PURPLE LF		61.5%	0
04-01-1338	WEATHERMASTER XT 362 GREEN LF		57.3%	0
04-01-1357	WEATHERMASTER XT 118 YELLOW LF		66.2%	0
04-01-1363	WEATHER-MASTER XT 7627 RED LF		57.3%	0
04-01-1373	WEATHERMASTER XT 4625 BROWN LF		54.1%	0



Reliance Packaging
 155 Anderson St.
 Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

May 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
04-01-1377	WEATHERMASTER XT 357 GREEN LF		58.7%	0
04-01-1380	WEATHERMASTER XT PANTONE GREEN C LF		57.5%	0
04-01-1382	WEATHERMASTER XT 138 TAN LF		58.4%	0
04-01-1390	WEATHERMASTER XT WARM GRAY 7C LF		68.8%	0
04-01-1406	WEATHERMASTER XT 188 RED LF		59.8%	0
04-01-1407	WEATHERMASTER XT 470 BROWN LF		54.4%	0
04-01-1420	WEATHERMASTER XT 335 GREEN LF		58.8%	0
04-01-1470	WEATHERMASTER XT 470 BROWN LF		54.4%	0
04-01-1418	WEATHERMASTER XT 5185 PURPLE LF		62.9%	0
04-01-1427	WEATHERMASTER XT 3005 BLUE LF		57.0%	0
04-01-1428	WEATHERMASTER XT 342 GREEN LF	134	62.0%	83
04-01-1472	WEATHERMASTER XT 1595 ORANGE LF		58.3%	0
04-01-1484	WEATHERMASTER XT 173 RED LF		69.7%	0
04-01-1503	WEATHERMASTER XT 479 TAN LF		68.6%	0
04-01-1512	WEATHERMASTER XT 486 RED LF		70.3%	0
04-01-1525	WEATHERMASTER XT 1235 YELLOW LF		72.4%	0
04-01-1526	WEATHERMASTER XT 807 PURPLE LF		71.2%	0
04-01-1527	WEATHERMASTER XT 513 PURPLE LF		71.5%	0
04-01-1528	WEATHERMASTER XT 322 BLUE LF		56.8%	0
04-01-1529	WEATHERMASTER XT 2718 BLUE LF		67.8%	0
04-01-1530	WEATHERMASTER XT 141 YELLOW LF		64.9%	0
04-01-1531	WEATHERMASTER XT 126 BROWN LF		64.9%	0
04-01-1545	WEATHERMASTER XT 329 GREEN LF		68.5%	0
04-01-1603	WEATHERMASTER XT SUNSCAPES SPM VIOLET	105	56.9%	60
04-01-1604	WEATHERMASTER XT SUNSCAPES PB YELLOW	105	64.5%	68
04-01-1605	WEATHERMASTER XT SUNSCAPE RLR RED LF		57.5%	0
04-01-1606	WEATHERMASTER XT SUNSCAPES PS ORANGE	105	59.4%	62
04-01-1607	WEATHERMASTER XT SUNSCAPES PM PINK LF	105	59.1%	62
04-01-1608	WEATHERMASTER XT SUNSCAPES NSS GREEN	105	54.8%	58
04-01-1609	WEATHERMASTER XT SUNSCAPES DFR GRAY LF	105	71.3%	75
04-01-1610	WEATHERMASTER XT SUNSCAPES MMC BLUE LF		60.9%	0
04-01-1611	WEATHERMASTER XT SUNSCAPES PG GREEN X	105	57.8%	61
04-01-1621	WEATHERMASTER XT 1935 RED LF		57.8%	0
04-01-1631	WEATHERMASTER XT 215 PINK LF		57.8%	0
04-01-1656	WEATHERMASTER XT 345 GREEN LF		69.2%	0
04-01-1716	WEATHERMASTER XT 368 GREEN LF		59.5%	0
04-01-1718	WEATHERMASTER XT 1245 YELLOW LF		53.3%	0
04-01-1727	WEATHERMASTER XT 269 VIOLET LF		29.3%	0
04-01-1728	WEATHERMASTER XT 240 PINK LF		57.9%	0
04-01-1729	WEATHERMASTER XT 334 GREEN LF		54.0%	0
04-01-1738	WEATHERMASTER XT 4695 BROWN LF		54.6%	0
04-01-1742	WEATHERMASTER XT 359 GREEN LF		66.6%	0



Reliance Packaging
155 Anderson St.
Aberdeen, NC 28316

CAI, Inc. Georgetown, MA

May 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
04-01-1747	WEATHERMASTER XT 224 PINK LF		65.8%	0
04-01-1748	WEATHERMASTER XT 228 RED LF		57.0%	0
04-01-1749	WEATHERMASTER XT 107 YELLOW LF		58.1%	0
04-01-1750	WEATHERMASTER XT 504 BURGANDY LF		56.6%	0
04-01-1758	WEATHERMASTER XT WARM GRAY 2C LF		71.2%	0
04-01-1759	WEATHERMASTER XT WARM GRAY 5C LF		71.0%	0
04-01-1760	WEATHERMASTER XT 343 GREEN LF		56.0%	0
04-01-1761	WEATHERMASTER XT 289 BLUE LF		53.9%	0
04-01-1777	WEATHERMASTER XT 428 GRAY LF		71.3%	0
04-01-1778	WEATHERMASTER XT 249 PURPLE LF		57.8%	0
04-01-1792	WEATHERMASTER XT 7568 BROWN LF		62.0%	0
98-0054	ARCOSOLVE PNP		100.0%	0
				0
Total (lbs)		12,259		6,303

Reliance Packaging
155 Anderson St.
Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

April 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
01-1068	SOIL WHITE LO SLIP	8160	45.8%	3,735
01-1283	SOIL BLACK HI STR LO SLIP	2660	54.5%	1,450
01-1292	SOIL NON-SKID LACQUER LO SLIP		64.1%	0
01-2751	SOIL NON-SKID OPV		58.9%	0
04-01-0061	WEATHER-MASTER XT CYAN BLUE LF	140	59.9%	84
04-01-0897	WEATHER-MASTER XT 185 RED LF		60.6%	0
04-01-0904	WEATHER-MASTER XT 1505 ORANGE LF		56.9%	0
04-01-0906	WEATHER-MASTER XT285 BLUE LF		66.9%	0
04-01-0909	WEATHER-MASTER XT 469 BROWN LF		57.8%	0
04-01-0918	WEATHER-MASTER XT 021 ORANGE LF		60.0%	0
04-01-0919	WEATHER-MASTER XT 485 RED LF		59.8%	0
04-01-0943	WEATHER-MASTER XT 201 RED LF		60.4%	0
04-01-0945	WEATHER-MASTER XT 102 YELLOW LF	350	57.0%	200
04-01-0951	WEATHER-MASTER XT 476 BROWN LF	1400	58.0%	812
04-01-0952	WEATHER-MASTER XT 187 RED LF	1400	60.4%	846
04-01-0953	WEATHER-MASTER XT 108 YELLOW LF	700	61.6%	431
04-01-0957	WEATHER-MASTER XT 347 GREEN LF		60.8%	0
04-01-0963	WEATHER-MASTER XT REFLEX BLUE LF		65.7%	0
04-01-0970	WEATHER-MASTER XT 355 GREEN LF		59.2%	0
04-01-0994	WEATHER-MASTER XT LINE PROC MAGENTA LF	350	63.3%	222
04-01-1010	WEATHER-MASTER XT 172 ORANGE LF	175	56.6%	99
04-01-1049	WEATHER-MASTER XT 583 GREEN		58.7%	0
04-01-1109	WEATHER-MASTER XT 482 TAN		74.4%	0
04-01-1144	WEATHER-MASTER XT 348 GREEN LF		56.6%	0
04-01-1163	WEATHERMASTER XT 349 GREEN LF		57.0%	0
04-01-1164	WEATHER-MASTER XT 139 TAN LF		56.8%	0
04-01-1193	WEATHER-MASTER XT 511 PURPLE LF		57.3%	0
04-01-1249	WEATHERMASTER XT CYPRESS BLUE		59.8%	0
04-01-1257	WEATHER-MASTER XT 376 GREEN LF		59.8%	0
04-01-1263	WEATHER-MASTER XT 264 VIOLET LF		53.5%	0
04-01-1264	WEATHER-MASTER XT 508 BROWN LF		70.1%	0
04-01-1265	WEATHER-MASTER XT 608 YELLOW LF		57.6%	0
04-01-1290	WEATHER-MASTER XT PURPLE C LF		64.0%	0
04-01-1305	WEATHERMASTER XT 100 YELLOW		70.7%	0
04-01-1306	WEATHERMASTER XT 463 BROWN		65.5%	0
04-01-1307	WEATHERMASTER XT 465 BROWN		59.6%	0
04-01-1310	WEATHERMASTER XT 401 GRAY		67.3%	0
04-01-1337	WEATHERMASTER XT 267 PURPLE LF		61.5%	0
04-01-1338	WEATHERMASTER XT 362 GREEN LF		57.3%	0
04-01-1357	WEATHERMASTER XT 118 YELLOW LF	140	66.2%	93
04-01-1363	WEATHER-MASTER XT 7627 RED LF		57.3%	0
04-01-1373	WEATHERMASTER XT 4625 BROWN LF	360	54.1%	195




Reliance Packaging
 155 Anderson St.
 Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

April 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
04-01-1377	WEATHERMASTER XT 357 GREEN LF	140	58.7%	82
04-01-1380	WEATHERMASTER XT PANTONE GREEN C LF		57.5%	0
04-01-1382	WEATHERMASTER XT 138 TAN LF	108	58.4%	63
04-01-1390	WEATHERMASTER XT WARM GRAY 7C LF		68.8%	0
04-01-1406	WEATHERMASTER XT 188 RED LF		59.8%	0
04-01-1407	WEATHERMASTER XT 470 BROWN LF		54.4%	0
04-01-1420	WEATHERMASTER XT 335 GREEN LF		58.8%	0
04-01-1470	WEATHERMASTER XT 470 BROWN LF		54.4%	0
04-01-1418	WEATHERMASTER XT 5185 PURPLE LF		62.9%	0
04-01-1427	WEATHERMASTER XT 3005 BLUE LF		57.0%	0
04-01-1428	WEATHERMASTER XT 342 GREEN LF		62.0%	0
04-01-1472	WEATHERMASTER XT 1595 ORANGE LF		58.3%	0
04-01-1484	WEATHERMASTER XT 173 RED LF		69.7%	0
04-01-1503	WEATHERMASTER XT 479 TAN LF		68.6%	0
04-01-1512	WEATHERMASTER XT 486 RED LF		70.3%	0
04-01-1525	WEATHERMASTER XT 1235 YELLOW LF	175	72.4%	127
04-01-1526	WEATHERMASTER XT 807 PURPLE LF		71.2%	0
04-01-1527	WEATHERMASTER XT 513 PURPLE LF		71.5%	0
04-01-1528	WEATHERMASTER XT 322 BLUE LF		56.8%	0
04-01-1529	WEATHERMASTER XT 2718 BLUE LF		67.8%	0
04-01-1530	WEATHERMASTER XT 141 YELLOW LF		64.9%	0
04-01-1531	WEATHERMASTER XT 126 BROWN LF	700	64.9%	454
04-01-1545	WEATHERMASTER XT 329 GREEN LF		68.5%	0
04-01-1603	WEATHERMASTER XT SUNSCAPES SPM VIOLET	105	56.9%	60
04-01-1604	WEATHERMASTER XT SUNSCAPES PB YELLOW	105	64.5%	68
04-01-1605	WEATHERMASTER XT SUNSCAPE RLR RED LF	105	57.5%	60
04-01-1606	WEATHERMASTER XT SUNSCAPES PS ORANGE	111	59.4%	66
04-01-1607	WEATHERMASTER XT SUNSCAPES PM PINK LF	105	59.1%	62
04-01-1608	WEATHERMASTER XT SUNSCAPES NSS GREEN	105	54.8%	58
04-01-1609	WEATHERMASTER XT SUNSCAPES DFR GRAY LF	105	71.3%	75
04-01-1610	WEATHERMASTER XT SUNSCAPES MMC BLUE LF	455	60.9%	277
04-01-1611	WEATHERMASTER XT SUNSCAPES PG GREEN X	105	57.8%	61
04-01-1621	WEATHERMASTER XT 1935 RED LF		57.8%	0
04-01-1631	WEATHERMASTER XT 215 PINK LF	140	57.8%	81
04-01-1656	WEATHERMASTER XT 345 GREEN LF	140	69.2%	97
04-01-1716	WEATHERMASTER XT 368 GREEN LF		59.5%	0
04-01-1718	WEATHERMASTER XT 1245 YELLOW LF		53.3%	0
04-01-1727	WEATHERMASTER XT 269 VIOLET LF		29.3%	0
04-01-1728	WEATHERMASTER XT 240 PINK LF		57.9%	0
04-01-1729	WEATHERMASTER XT 334 GREEN LF		54.0%	0
04-01-1738	WEATHERMASTER XT 4695 BROWN LF		54.8%	0
04-01-1742	WEATHERMASTER XT 359 GREEN LF		66.6%	0

		Reliance Packaging		
		155 Anderson St. Aberdeen, NC 28315		
CAI, Inc. Georgetown, MA				
April 2018 VOC Summary				
Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
04-01-1747	WEATHERMASTER XT 224 PINK LF		65.8%	0
04-01-1748	WEATHERMASTER XT 228 RED LF		57.0%	0
04-01-1749	WEATHERMASTER XT 107 YELLOW LF		58.1%	0
04-01-1750	WEATHERMASTER XT 504 BURGANDY LF		56.6%	0
04-01-1758	WEATHERMASTER XT WARM GRAY 2C LF		71.2%	0
04-01-1759	WEATHERMASTER XT WARM GRAY 5C LF		71.0%	0
04-01-1760	WEATHERMASTER XT 343 GREEN LF		56.0%	0
04-01-1761	WEATHERMASTER XT 289 BLUE LF		53.9%	0
04-01-1777	WEATHERMASTER XT 428 GRAY LF		71.3%	0
04-01-1778	WEATHERMASTER XT 249 PURPLE LF		57.8%	0
04-01-1792	WEATHERMASTER XT 7588 BROWN LF		62.0%	0
98-0054	ARCOSOLVE PNP		100.0%	0
Total (lbs)		18,539		9,855




Reliance Packaging
155 Anderson St.
Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

March 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
01-1068	SOIL WHITE LO SLIP	9120	45.8%	4,174
01-1283	SOIL BLACK HI STR LO SLIP	3040	54.5%	1,657
01-1292	SOIL NON-SKID LACQUER LO SLIP		64.1%	0
01-2751	SOIL NON-SKID OPV		58.9%	0
04-01-0061	WEATHER-MASTER XT CYAN BLUE LF		59.9%	0
04-01-0897	WEATHER-MASTER XT 185 RED LF		60.6%	0
04-01-0904	WEATHER-MASTER XT 1505 ORANGE LF		56.9%	0
04-01-0906	WEATHER-MASTER XT285 BLUE LF		66.9%	0
04-01-0909	WEATHER-MASTER XT 469 BROWN LF		57.8%	0
04-01-0918	WEATHER-MASTER XT 021 ORANGE LF		60.0%	0
04-01-0919	WEATHER-MASTER XT 485 RED LF		59.8%	0
04-01-0943	WEATHER-MASTER XT 201 RED LF	360	60.4%	217
04-01-0945	WEATHER-MASTER XT 102 YELLOW LF	370	57.0%	211
04-01-0951	WEATHER-MASTER XT 476 BROWN LF	2510	58.0%	1,456
04-01-0952	WEATHER-MASTER XT 187 RED LF		60.4%	0
04-01-0953	WEATHER-MASTER XT 108 YELLOW LF	370	61.6%	228
04-01-0957	WEATHER-MASTER XT 347 GREEN LF		60.8%	0
04-01-0963	WEATHER-MASTER XT REFLEX BLUE LF	144	65.7%	95
04-01-0970	WEATHER-MASTER XT 355 GREEN LF	350	59.2%	207
04-01-0994	WEATHER-MASTER XT LINE PROC MAGENTA LF		63.3%	0
04-01-1010	WEATHER-MASTER XT 172 ORANGE LF		56.6%	0
04-01-1049	WEATHER-MASTER XT 583 GREEN		58.7%	0
04-01-1109	WEATHER-MASTER XT 482 TAN		74.4%	0
04-01-1144	WEATHER-MASTER XT 348 GREEN LF		56.6%	0
04-01-1163	WEATHERMASTER XT 349 GREEN LF		57.0%	0
04-01-1164	WEATHER-MASTER XT 139 TAN LF		56.8%	0
04-01-1193	WEATHER-MASTER XT 511 PURPLE LF		57.3%	0
04-01-1249	WEATHERMASTER XT CYPRESS BLUE	70	59.8%	42
04-01-1257	WEATHER-MASTER XT 376 GREEN LF		59.8%	0
04-01-1263	WEATHER-MASTER XT 264 VIOLET LF	70	53.5%	37
04-01-1264	WEATHER-MASTER XT 506 BROWN LF		70.1%	0
04-01-1265	WEATHER-MASTER XT 608 YELLOW LF	105	57.6%	60
04-01-1290	WEATHER-MASTER XT PURPLE C LF		64.0%	0
04-01-1305	WEATHERMASTER XT 100 YELLOW		70.7%	0
04-01-1306	WEATHERMASTER XT 463 BROWN		65.5%	0
04-01-1307	WEATHERMASTER XT 465 BROWN		59.6%	0
04-01-1310	WEATHERMASTER XT 401 GRAY		67.3%	0
04-01-1337	WEATHERMASTER XT 267 PURPLE LF		61.5%	0
04-01-1338	WEATHERMASTER XT 362 GREEN LF		57.3%	0
04-01-1357	WEATHERMASTER XT 118 YELLOW LF		66.2%	0
04-01-1363	WEATHER-MASTER XT 7627 RED LF		57.3%	0
04-01-1373	WEATHERMASTER XT 4625 BROWN LF		54.1%	0

		Reliance Packaging 155 Anderson St. Aberdeen, NC 28315		
CAI, Inc. Georgetown, MA				
March 2018 VOC Summary				
Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
04-01-1377	WEATHERMASTER XT 357 GREEN LF		58.7%	0
04-01-1380	WEATHERMASTER XT PANTONE GREEN C LF		57.5%	0
04-01-1382	WEATHERMASTER XT 138 TAN LF		58.4%	0
04-01-1390	WEATHERMASTER XT WARM GRAY 7C LF	175	68.8%	120
04-01-1406	WEATHERMASTER XT 188 RED LF		59.8%	0
04-01-1407	WEATHERMASTER XT 470 BROWN LF		54.4%	0
04-01-1420	WEATHERMASTER XT 335 GREEN LF		58.8%	0
04-01-1470	WEATHERMASTER XT 470 BROWN LF		54.4%	0
04-01-1418	WEATHERMASTER XT 5185 PURPLE LF		62.9%	0
04-01-1427	WEATHERMASTER XT 3005 BLUE LF		57.0%	0
04-01-1428	WEATHERMASTER XT 342 GREEN LF		62.0%	0
04-01-1472	WEATHERMASTER XT 1595 ORANGE LF		58.3%	0
04-01-1484	WEATHERMASTER XT 173 RED LF		69.7%	0
04-01-1503	WEATHERMASTER XT 479 TAN LF		68.6%	0
04-01-1512	WEATHERMASTER XT 486 RED LF		70.3%	0
04-01-1525	WEATHERMASTER XT 1235 YELLOW LF		72.4%	0
04-01-1526	WEATHERMASTER XT 807 PURPLE LF		71.2%	0
04-01-1527	WEATHERMASTER XT 513 PURPLE LF		71.5%	0
04-01-1528	WEATHERMASTER XT 322 BLUE LF		56.8%	0
04-01-1529	WEATHERMASTER XT 2718 BLUE LF		67.8%	0
04-01-1530	WEATHERMASTER XT 141 YELLOW LF	700	64.9%	454
04-01-1531	WEATHERMASTER XT 126 BROWN LF	350	64.9%	227
04-01-1545	WEATHERMASTER XT 329 GREEN LF	1100	68.5%	754
04-01-1603	WEATHERMASTER XT SUNSCAPES SPM VIOLET LF		56.9%	0
04-01-1604	WEATHERMASTER XT SUNSCAPES PB YELLOW LF		64.5%	0
04-01-1605	WEATHERMASTER XT SUNSCAPE RLR RED LF		57.5%	0
04-01-1606	WEATHERMASTER XT SUNSCAPES PS ORANGE LF		59.4%	0
04-01-1607	WEATHERMASTER XT SUNSCAPES PM PINK LF		59.1%	0
04-01-1608	WEATHERMASTER XT SUNSCAPES NSS GREEN LF		54.8%	0
04-01-1609	WEATHERMASTER XT SUNSCAPES DFR GRAY LF		71.3%	0
04-01-1610	WEATHERMASTER XT SUNSCAPES MMC BLUE LF		60.9%	0
04-01-1611	WEATHERMASTER XT SUNSCAPES PG GREEN XT		57.8%	0
04-01-1621	WEATHERMASTER XT 1935 RED LF	175	57.8%	101
04-01-1631	WEATHERMASTER XT 215 PINK LF		57.8%	0
04-01-1656	WEATHERMASTER XT 345 GREEN LF		69.2%	0
04-01-1716	WEATHERMASTER XT 368 GREEN LF		59.5%	0
04-01-1718	WEATHERMASTER XT 1245 YELLOW LF		53.3%	0
04-01-1727	WEATHERMASTER XT 269 VIOLET LF		29.3%	0
04-01-1728	WEATHERMASTER XT 240 PINK LF		57.9%	0
04-01-1729	WEATHERMASTER XT 334 GREEN LF		54.0%	0
04-01-1738	WEATHERMASTER XT 4695 BROWN LF		54.6%	0
04-01-1742	WEATHERMASTER XT 359 GREEN LF		66.6%	0



Reliance Packaging
155 Anderson St.
Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

March 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
04-01-1747	WEATHERMASTER XT 224 PINK LF		65.8%	0
04-01-1748	WEATHERMASTER XT 228 RED LF		57.0%	0
04-01-1749	WEATHERMASTER XT 107 YELLOW LF		58.1%	0
04-01-1750	WEATHERMASTER XT 504 BURGANDY LF		56.6%	0
04-01-1758	WEATHERMASTER XT WARM GRAY 2C LF		71.2%	0
04-01-1759	WEATHERMASTER XT WARM GRAY 5C LF		71.0%	0
04-01-1760	WEATHERMASTER XT 343 GREEN LF		56.0%	0
04-01-1761	WEATHERMASTER XT 289 BLUE LF		53.9%	0
04-01-1777	WEATHERMASTER XT 428 GRAY LF		71.3%	0
04-01-1778	WEATHERMASTER XT 249 PURPLE LF		57.8%	0
04-01-1792	WEATHERMASTER XT 7568 BROWN LF		62.0%	0
98-0054	ARCOSOLVE PNP		100.0%	0
				0
Total (lbs)		19,009		10,041

Reliance Packaging
155 Anderson St.
Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

February 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
01-1068	SOIL WHITE LO SLIP	2400	45.8%	1,098
01-1283	SOIL BLACK HI STR LO SLIP		54.5%	0
01-1292	SOIL NON-SKID LACQUER LO SLIP		64.1%	0
01-2751	SOIL NON-SKID OPV		58.9%	0
04-01-0061	WEATHER-MASTER XT CYAN BLUE LF	105	59.9%	63
04-01-0897	WEATHER-MASTER XT 185 RED LF		60.6%	0
04-01-0904	WEATHER-MASTER XT 1505 ORANGE LF		56.9%	0
04-01-0906	WEATHER-MASTER XT285 BLUE LF		66.9%	0
04-01-0909	WEATHER-MASTER XT 469 BROWN LF		57.8%	0
04-01-0918	WEATHER-MASTER XT 021 ORANGE LF		60.0%	0
04-01-0919	WEATHER-MASTER XT 485 RED LF		59.8%	0
04-01-0943	WEATHER-MASTER XT 201 RED LF		60.4%	0
04-01-0945	WEATHER-MASTER XT 102 YELLOW LF		57.0%	0
04-01-0951	WEATHER-MASTER XT 476 BROWN LF	746	58.0%	433
04-01-0952	WEATHER-MASTER XT 187 RED LF		60.4%	0
04-01-0953	WEATHER-MASTER XT 108 YELLOW LF		61.6%	0
04-01-0963	WEATHER-MASTER XT REFLEX BLUE LF	140	65.7%	92
04-01-0970	WEATHER-MASTER XT 355 GREEN LF		59.2%	0
04-01-0994	WEATHER-MASTER XT LINE PROC MAGENTA LF		63.3%	0
04-01-1010	WEATHER-MASTER XT 172 ORANGE LF		56.6%	0
04-01-1049	WEATHER-MASTER XT 583 GREEN		58.7%	0
04-01-1109	WEATHER-MASTER XT 482 TAN		74.4%	0
04-01-1144	WEATHER-MASTER XT 348 GREEN LF		56.6%	0
04-01-1163	WEATHERMASTER XT 349 GREEN LF		57.0%	0
04-01-1164	WEATHER-MASTER XT 139 TAN LF		56.8%	0
04-01-1193	WEATHER-MASTER XT 511 PURPLE LF		57.3%	0
04-01-1249	WEATHERMASTER XT CYPRESS BLUE		59.8%	0
04-01-1257	WEATHER-MASTER XT 376 GREEN LF		59.8%	0
04-01-1263	WEATHER-MASTER XT 264 VIOLET LF		53.5%	0
04-01-1264	WEATHER-MASTER XT 506 BROWN LF		70.1%	0
04-01-1265	WEATHER-MASTER XT 608 YELLOW LF		57.6%	0
04-01-1305	WEATHERMASTER XT 100 YELLOW		70.7%	0
04-01-1306	WEATHERMASTER XT 463 BROWN		65.5%	0
04-01-1307	WEATHERMASTER XT 465 BROWN		59.6%	0
04-01-1357	WEATHERMASTER XT 118 YELLOW LF		66.2%	0
04-01-1363	WEATHER-MASTER XT 7627 RED LF		57.3%	0
04-01-1373	WEATHERMASTER XT 4625 BROWN LF		54.1%	0
04-01-1377	WEATHERMASTER XT 357 GREEN LF		58.7%	0
04-01-1380	WEATHERMASTER XT PANTONE GREEN C LF		57.5%	0
04-01-1382	WEATHERMASTER XT 138 TAN LF		58.4%	0
04-01-1390	WEATHERMASTER XT WARM GRAY 7C LF		68.8%	0
04-01-1406	WEATHERMASTER XT 188 RED LF		59.8%	0




Reliance Packaging
 155 Anderson St.
 Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

February 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
04-01-1470	WEATHERMASTER XT 470 BROWN LF		54.4%	0
04-01-1417	WEATHERMASTER XT 7533 BROWN LF	350	64.0%	224
04-01-1418	WEATHERMASTER XT 5185 PURPLE LF		62.9%	0
04-01-1420	WEATHERMASTER XT 335 GREEN LF		58.8%	0
04-01-1427	WEATHERMASTER XT 3005 BLUE LF		57.0%	0
04-01-1428	WEATHERMASTER XT 342 GREEN LF	360	62.0%	223
04-01-1472	WEATHERMASTER XT 1595 ORANGE LF		58.3%	0
04-01-1484	WEATHERMASTER XT 173 RED LF		69.7%	0
04-01-1503	WEATHERMASTER XT 479 TAN LF		68.6%	0
04-01-1512	WEATHERMASTER XT 486 RED LF		70.3%	0
04-01-1525	WEATHERMASTER XT 1235 YELLOW LF	140	72.4%	101
04-01-1526	WEATHERMASTER XT 807 PURPLE LF		71.2%	0
04-01-1527	WEATHERMASTER XT 513 PURPLE LF		71.5%	0
04-01-1528	WEATHERMASTER XT 322 BLUE LF		56.8%	0
04-01-1529	WEATHERMASTER XT 2718 BLUE LF		67.8%	0
04-01-1530	WEATHERMASTER XT 141 YELLOW LF		64.9%	0
04-01-1531	WEATHERMASTER XT 126 BROWN LF		64.9%	0
04-01-1545	WEATHERMASTER XT 329 GREEN LF		68.5%	0
04-01-1603	WEATHERMASTER XT SUNSCAPES SPM VIOLET LF		56.9%	0
04-01-1604	WEATHERMASTER XT SUNSCAPES PB YELLOW LF		64.5%	0
04-01-1605	WEATHERMASTER XT SUNSCAPE RLR RED LF		57.5%	0
04-01-1606	WEATHERMASTER XT SUNSCAPES PS ORANGE LF		59.4%	0
04-01-1607	WEATHERMASTER XT SUNSCAPES PM PINK LF		59.1%	0
04-01-1608	WEATHERMASTER XT SUNSCAPES NSS GREEN LF		54.8%	0
04-01-1609	WEATHERMASTER XT SUNSCAPES DFR GRAY LF		71.3%	0
04-01-1610	WEATHERMASTER XT SUNSCAPES MMC BLUE LF		60.9%	0
04-01-1611	WEATHERMASTER XT SUNSCAPES PG GREEN XT		57.8%	0
04-01-1621	WEATHERMASTER XT 1935 RED LF		57.8%	0
04-01-1631	WEATHERMASTER XT 215 PINK LF		57.8%	0
04-01-1656	WEATHERMASTER XT 345 GREEN LF		69.2%	0
04-01-1716	WEATHERMASTER XT 368 GREEN LF		59.5%	0
04-01-1718	WEATHERMASTER XT 1245 YELLOW LF		53.3%	0
04-01-1727	WEATHERMASTER XT 269 VIOLET LF		29.3%	0
04-01-1728	WEATHERMASTER XT 240 PINK LF		57.9%	0
04-01-1729	WEATHERMASTER XT 334 GREEN LF		54.0%	0
04-01-1738	WEATHERMASTER XT 4695 BROWN LF		54.6%	0
04-01-1742	WEATHERMASTER XT 359 GREEN LF		66.6%	0
04-01-1747	WEATHERMASTER XT 224 PINK LF		65.8%	0
04-01-1748	WEATHERMASTER XT 228 RED LF		57.0%	0
04-01-1749	WEATHERMASTER XT 107 YELLOW LF		58.1%	0
04-01-1750	WEATHERMASTER XT 504 BURGANDY LF		56.6%	0
04-01-1758	WEATHERMASTER XT WARM GRAY 2C LF		71.2%	0

		Reliance Packaging		
		155 Anderson St. Aberdeen, NC 28315		
CAI, Inc. Georgetown, MA				
February 2018 VOC Summary				
Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
04-01-1759	WEATHERMASTER XT WARM GRAY 5C LF		71.0%	0
04-01-1760	WEATHERMASTER XT 343 GREEN LF		56.0%	0
04-01-1761	WEATHERMASTER XT 288 BLUE LF		53.9%	0
04-01-1777	WEATHERMASTER XT 428 GRAY LF		71.3%	0
04-01-1778	WEATHERMASTER XT 249 PURPLE LF		57.8%	0
04-01-1792	WEATHERMASTER XT 7568 BROWN LF		62.0%	0
98-0054	ARCOSOLVE PNP		100.0%	0
Total (lbs)		4,241		2,235



Reliance Packaging
 155 Anderson St.
 Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

January 2018 VOC Summary


Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
01-1068	SOIL WHITE LO SLIP	4320	45.8%	1,977
01-1283	SOIL BLACK HI STR LO SLIP	3040	54.5%	1,657
01-1292	SOIL NON-SKID LACQUER LO SLIP		64.1%	0
01-2751	SOIL NON-SKID OPV		58.9%	0
04-01-0061	WEATHER-MASTER XT CYAN BLUE LF		59.9%	0
04-01-0897	WEATHER-MASTER XT 185 RED LF		60.6%	0
04-01-0904	WEATHER-MASTER XT 1505 ORANGE LF		56.9%	0
04-01-0909	WEATHER-MASTER XT 469 BROWN LF	700	57.8%	405
04-01-0918	WEATHER-MASTER XT 021 ORANGE LF		60.0%	0
04-01-0919	WEATHER-MASTER XT 485 RED LF	350	59.8%	209
04-01-0943	WEATHER-MASTER XT 201 RED LF	350	60.4%	211
04-01-0945	WEATHER-MASTER XT 102 YELLOW LF	700	57.0%	399
04-01-0951	WEATHER-MASTER XT 476 BROWN LF	1400	58.0%	812
04-01-0952	WEATHER-MASTER XT 187 RED LF		60.4%	0
04-01-0953	WEATHER-MASTER XT 108 YELLOW LF	350	61.6%	216
04-01-0963	WEATHER-MASTER XT REFLEX BLUE LF		65.7%	0
04-01-0970	WEATHER-MASTER XT 355 GREEN LF		59.2%	0
04-01-0994	WEATHER-MASTER XT LINE PROC MAGENTA LF		63.3%	0
04-01-1010	WEATHER-MASTER XT 172 ORANGE LF		56.6%	0
04-01-1049	WEATHER-MASTER XT 583 GREEN		58.7%	0
04-01-1109	WEATHER-MASTER XT 482 TAN		74.4%	0
04-01-1163	WEATHERMASTER XT 349 GREEN LF		57.0%	0
04-01-1249	WEATHERMASTER XT CYPRESS BLUE		59.8%	0
04-01-1257	WEATHER-MASTER XT 376 GREEN LF		53.5%	0
04-01-1263	WEATHER-MASTER XT 264 VIOLET LF		70.1%	0
04-01-1264	WEATHER-MASTER XT 506 BROWN LF		57.6%	0
04-01-1265	WEATHER-MASTER XT 608 YELLOW LF		70.7%	0
04-01-1305	WEATHERMASTER XT 100 YELLOW		65.5%	0
04-01-1306	WEATHERMASTER XT 463 BROWN		59.6%	0
04-01-1307	WEATHERMASTER XT 465 BROWN		66.2%	0
04-01-1338	WEATHERMASTER XT 362 GREEN LF	105	57.5%	60
04-01-1357	WEATHERMASTER XT 118 YELLOW LF		55.8%	0
04-01-1373	WEATHERMASTER XT 4625 BROWN LF		54.1%	0
04-01-1377	WEATHERMASTER XT 357 GREEN LF	105	58.7%	62
04-01-1380	WEATHERMASTER XT PANTONE GREEN C LF		57.5%	0
04-01-1382	WEATHERMASTER XT 138 TAN LF		58.4%	0
04-01-1390	WEATHERMASTER XT WARM GRAY 7C LF		68.8%	0
04-01-1392	WEATHERMASTER XT 7566 ORANGE LF	140	60.1%	84
04-01-1406	WEATHERMASTER XT 188 RED LF		59.8%	0
04-01-1418	WEATHERMASTER XT 5185 PURPLE LF		62.9%	0
04-01-1420	WEATHERMASTER XT 335 GREEN LF		58.8%	0
04-01-1427	WEATHERMASTER XT 3005 BLUE LF		57.0%	0

Reliance Packaging
155 Anderson St.
Aberdeen, NC 28315

CAI, Inc. Georgetown, MA

January 2018 VOC Summary

Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
04-01-1428	WEATHERMASTER XT 342 GREEN LF	140	62.0%	87
04-01-1472	WEATHERMASTER XT 1595 ORANGE LF		58.3%	0
04-01-1484	WEATHERMASTER XT 173 RED LF		69.7%	0
04-01-1503	WEATHERMASTER XT 479 TAN LF	70	68.6%	48
04-01-1512	WEATHERMASTER XT 486 RED LF		70.3%	0
04-01-1525	WEATHERMASTER XT 1235 YELLOW LF		72.4%	0
04-01-1526	WEATHERMASTER XT 807 PURPLE LF		71.2%	0
04-01-1527	WEATHERMASTER XT 513 PURPLE LF		71.5%	0
04-01-1528	WEATHERMASTER XT 322 BLUE LF		56.8%	0
04-01-1529	WEATHERMASTER XT 2718 BLUE LF		67.8%	0
04-01-1530	WEATHERMASTER XT 141 YELLOW LF	350	64.9%	227
04-01-1531	WEATHERMASTER XT 126 BROWN LF	350	64.9%	227
04-01-1545	WEATHERMASTER XT 329 GREEN LF	1050	68.5%	719
04-01-1603	WEATHERMASTER XT SUNSCAPES SPM VIOLET LF		56.9%	0
04-01-1604	WEATHERMASTER XT SUNSCAPES PB YELLOW LF		64.5%	0
04-01-1605	WEATHERMASTER XT SUNSCAPE RLR RED LF		57.5%	0
04-01-1606	WEATHERMASTER XT SUNSCAPES PS ORANGE LF		59.4%	0
04-01-1607	WEATHERMASTER XT SUNSCAPES PM PINK LF		59.1%	0
04-01-1608	WEATHERMASTER XT SUNSCAPES NSS GREEN LF		54.8%	0
04-01-1609	WEATHERMASTER XT SUNSCAPES DFR GRAY LF		71.3%	0
04-01-1610	WEATHERMASTER XT SUNSCAPES MMC BLUE LF		60.9%	0
04-01-1611	WEATHERMASTER XT SUNSCAPES PG GREEN XT		57.8%	0
04-01-1621	WEATHERMASTER XT 1935 RED LF		57.8%	0
04-01-1631	WEATHERMASTER XT 215 PINK LF		57.8%	0
04-01-1656	WEATHERMASTER XT 345 GREEN LF		69.2%	0
04-01-1716	WEATHERMASTER XT 368 GREEN LF		59.5%	0
04-01-1718	WEATHERMASTER XT 1245 YELLOW LF		53.3%	0
04-01-1727	WEATHERMASTER XT 269 VIOLET LF		29.3%	0
04-01-1728	WEATHERMASTER XT 240 PINK LF		57.9%	0
04-01-1729	WEATHERMASTER XT 334 GREEN LF		54.0%	0
04-01-1738	WEATHERMASTER XT 4695 BROWN LF		54.6%	0
04-01-1742	WEATHERMASTER XT 359 GREEN LF		66.6%	0
04-01-1747	WEATHERMASTER XT 224 PINK LF		65.8%	0
04-01-1748	WEATHERMASTER XT 228 RED LF		57.0%	0
04-01-1749	WEATHERMASTER XT 107 YELLOW LF		58.1%	0
04-01-1750	WEATHERMASTER XT 504 BURGANDY LF		56.6%	0
04-01-1758	WEATHERMASTER XT WARM GRAY 2C LF		71.2%	0
04-01-1759	WEATHERMASTER XT WARM GRAY 5C LF		71.0%	0
04-01-1760	WEATHERMASTER XT 343 GREEN LF		56.0%	0
04-01-1761	WEATHERMASTER XT 289 BLUE LF		53.9%	0
04-01-1777	WEATHERMASTER XT 428 GRAY LF		71.3%	0
04-01-1778	WEATHERMASTER XT 249 PURPLE LF		57.8%	0

		Reliance Packaging		
		155 Anderson St.		
		Aberdeen, NC 28315		
CAI, Inc. Georgetown, MA				
January 2018 VOC Summary				
Item#	Description	Purchased (lbs)	VOC Wt%	VOC (lbs)
98-0054	ARCOSOLVE PNP		100.0%	0
				0
Total (lbs)		13,520		7,400

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Partial Inspection Report
Date: 06/10/2019

Fayetteville Regional Office
Reliance Packaging
NC Facility ID 6300110
County/FIPS: Moore/125

Facility Data
Reliance Packaging
155 Anderson Street
Aberdeen, NC 28315
Lat: 35d 8.1466m Long: 79d 26.1264m
SIC: 2673 / Bags: Plastics, Laminated And Coated
NAICS: 322223 / Plastics, Foil, and Coated Paper Bag Manufacturing

Permit Data
Permit 10586 / R00
Issued 8/17/2018
Expires 7/31/2026
Class/Status Synthetic Minor
Permit Status Active
Current Permit Application(s) Modification

Contact Data		
Facility Contact	Authorized Contact	Technical Contact
Tom Prots Production Manager (910) 944-2561	Satish Sharma President (910) 944-2561	Chris Maye Senior Project Manager (215) 699-4800

Program Applicability
SIP

Comments: *JOL*
Inspector's Signature: *[Signature]*
Date of Signature: 06/10/19

Compliance Data
Inspection Date 05/23/2019
Inspector's Name Stephen Allen
Operating Status Operating
Compliance Code Violation - procedures
Action Code PCE
On-Site Inspection Result Violation

Total Actual emissions in TONS/YEAR:							
	TSP	SO2	NOX	VOC	CO	PM10	* HAP
No emissions inventory on record. The emissions inventory is due 05/02/2026.							

* Highest HAP Emitted (in pounds)

Five Year Violation History:			Violation Resolution Date
Date	Letter Type	Rule Violated	
08/03/2018	NOV	NCGS 143-215.108A Control of sources of air pollution; construction of new facilities; alteration or expansion of exis	08/03/2018

Performed Stack Tests since last FCE: None			
Date	Test Results	Test Method(s)	Source(s) Tested

- I. **DIRECTIONS TO FACILITY**
From FRO: Follow Murchison Rd, NC-210 N and N Bragg Blvd to NC-690 W/Vass Rd in Spring Lake. Turn left onto NC-690 W/Vass Rd (19 miles). Merge onto US-1 S (12 miles). Turn right onto NC-5 N/W South St. (0.6 miles). Turn left on Anderson Street, facility is on the left.
- II. **SAFETY CONSIDERATIONS**
Currently, there are no specific safety equipment requirements other than safety glasses in the printing area. It is recommended that the inspector have all the typical FRO safety gear available, including hard hat, safety glasses, safety shoes, and hearing protection.

Complaint Investigation Report

NC Dept. of Environmental Quality
Division of Air Quality

County: Moore
Region: FRO
Date: 23 May 2019
Facility name: Reliance Packaging
Facility ID# 6300110

*New
pics
added
4/21/19
pmg*

Reliance Packaging
155 Anderson Street
Aberdeen, NC 28315

Page 1 of 1

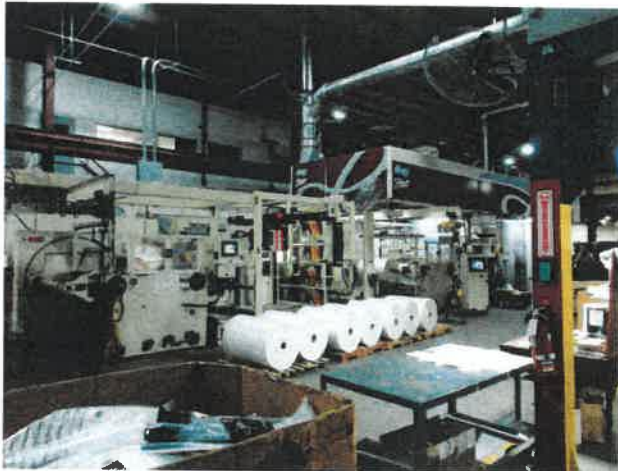
Pictures taken by FRO DAQ



Picture 1: Overall view of the regenerative thermal oxidizer.



Picture 2: Detail of the new control panel showing the RTO operating at 1514 degrees (F).



Picture 3: Press operating during the inspection.



Picture 4: Press operating during the inspection.

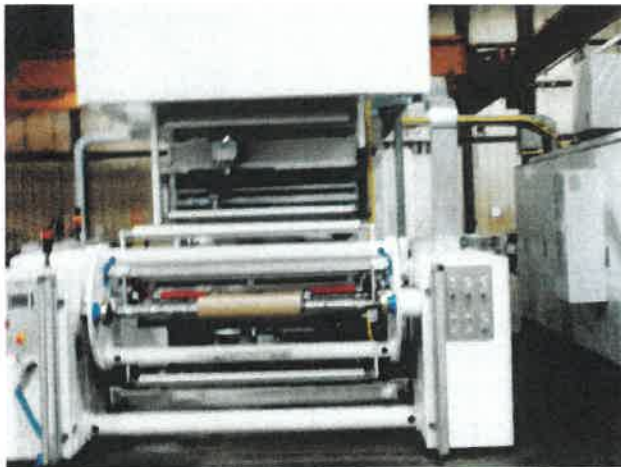
*31300
31302
82,550,000*



Picture 1: Overall view of the new press under construction in the printing facility.



Picture 2: Detail of the wiring in place behind the new press unit.



Picture 3: Detail of the printing press installed in the printing facility.



Picture 4: Detail of the control panel in place on the new press.

DIVISION OF AIR QUALITY - CIVIL PENALTY ASSESSMENT

Violator: Reliance Packaging

County: Moore

Case Number: 2019-056

ASSESSMENT FACTORS

- 1) The degree and extent of harm to the natural resources of the State, to the public health, or to private property resulting from the violation;

Higher VOC & HAP emissions resulted from the failure to operate control as required in the permit.

- 2) The duration and gravity of the violation;

Control did not operate from Sept 1, 2018 - April 1, 2019.

- 3) The effect on ground or surface water quantity or quality or on air quality;

Negatively impacted air quality nearby.

- 4) The cost of rectifying the damage;

Not clear. Emissions already in the environment.

- 5) The amount of money saved by noncompliance;

Seven months of operating costs associated with the thermal oxidizer were avoided.

- 6) Whether the violation was committed willfully or intentionally;

DAQ advised the facility that a permit modification was necessary prior to construction/installation of a new printing press. However, the facility installed the new press anyway, before the permit was issued.

- 7) The prior record of the violator in complying or failing to comply with programs over which the Environmental Management Commission has regulatory authority; and

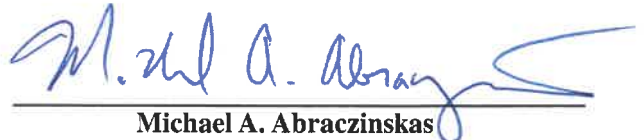
Aug 2018: NOV for failure to obtain an Air Quality permit prior to construction/installation of a source or control.

- 8) Cost to the State of the enforcement procedures;

Normal investigative costs.

12/20/19

Date


Michael A. Abraczinskas

ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL A. ABRACZINSKAS
Director



NORTH CAROLINA
Environmental Quality

CERTIFIED MAIL RETURN RECEIPT REQUESTED

7018 2290 0000 5334 5328

December 20, 2019

Mr. Satish Sharma, President
Reliance Packaging
175 Anderson St.
Aberdeen, NC 28315

SUBJECT: Civil Penalty Assessment for Violation(s)
2D .0611 Monitoring Emissions from Other Sources
2Q .0315 Synthetic Minor Facilities
2Q .0317 Avoidance Conditions
NCGS 143-215.108 Control of sources of air pollution; permits required.
File No.: DAQ 2019-056
Violator: Reliance Packaging
County: Moore
Facility ID: 6300110

Dear Mr. Sharma:

This letter transmits notice of civil penalty assessed against Reliance Packaging in the amount of \$9,229 and \$845 investigative costs, for a total of \$10,074.

Enclosed is a copy of the assessment document explaining this penalty. This action was taken under the authority vested in me by the delegation pursuant to North Carolina General Statutes (NCGS) 143-215.114A(d). Any new or continuing violation(s) may be the subject of a new enforcement action, including additional penalty.

You must take one of the three actions outlined below within thirty (30) days from the date of receipt of this letter. Please be advised that if you fail to exercise one of the following options within thirty (30) days, you will lose your right to appeal or contest this case and your case will be forwarded to the Attorney General's Office for collection.

1. Submit payment of the penalty:

Payment should be made directly to the order of the North Carolina Department of Environmental Quality (NCDEQ). When submitting payment, please reference your DAQ case number on your check to insure proper posting. Please do not include the attached waiver form when submitting payment. Payment of the penalty will not foreclose further enforcement action for any continuing or new violation(s). Please submit payment to the attention of:



North Carolina Department of Environmental Quality | Division Air Quality
217 West Jones Street, Suite 4000 | 1641 Mail Service Center | Raleigh, NC 27699-1641
919.707.8400 T

Enforcement Group - Payment
Department of Environmental Quality
Division of Air Quality
1641 Mail Service Center
Raleigh, NC 27699-1641

Please be advised, that it is the policy for NCDEQ to charge and collect a processing fee of \$25.00 for checks on which payment has been refused by the bank because of insufficient funds or because of an invalid bank account.

OR

2. Submit a written request for remission including a detailed justification for such request:

Please be aware that a request for remission is limited to consideration of the five factors listed below as they may relate to the reasonableness of the amount of the civil penalty assessed. Requesting remission is not the proper procedure for contesting whether the violation(s) occurred or the accuracy of the factual statements contained in the civil penalty assessment document. Because a remission request forecloses the option of an administrative hearing, such a request must be accompanied by a waiver of your right to an administrative hearing and a stipulation and agreement that no factual or legal issues are in dispute. Please prepare a detailed statement that establishes why you believe the civil penalty should be remitted, and submit it to the address listed below. In determining whether a remission request will be approved, the following factors shall be considered:

- (1) whether one or more of the civil penalty assessment factors in NCGS 143B-282.1(b) were wrongfully applied to the detriment of the violator;
- (2) whether the violator promptly abated continuing environmental damage resulting from the violation;
- (3) whether the violation was inadvertent or a result of an accident;
- (4) whether the violator has been assessed civil penalties for any previous violations; or
- (5) whether payment of the civil penalty will prevent payment for the remaining necessary remedial actions.

Please note that all evidence presented in support of your request for remission must be submitted in writing. **If you choose this option, do not send in payment at this time.** The Director of the Division of Air Quality (DAQ) will review your evidence and inform you of his decision in the matter of your remission request. The response will provide details regarding the case status, directions for payment, and provision for further appeal of the penalty to the Environmental Management Commission's Committee on Civil Penalty Remissions (Committee). Please be advised that the Committee cannot consider information that was not part of the original remission request considered by the Director. Therefore, it is very important that you prepare a complete and thorough statement in support of your request for remission.

In order to request remission, you must complete and submit the enclosed *"Request for Remission of Civil Penalties, Waiver of Right to an Administrative Hearing, and Stipulation of Facts"* form within thirty (30) days of receipt of this notice. The DAQ also requests that you complete and submit the enclosed *"Justification for Remission Request."* Both forms should be submitted to the following address:

Enforcement Group - Remission
Department of Environmental Quality
Division of Air Quality
1641 Mail Service Center
Raleigh, NC 27699-1641

OR

3. File a petition for an administrative hearing with the Office of Administrative Hearings:

If you wish to contest any statement in the attached assessment document you must file a petition for an administrative hearing. You may obtain the petition form from the Office of Administrative Hearings (OAH). You must file the petition with the OAH within thirty (30) days of receipt of this notice. A petition is considered filed when it is received in the Office of Administrative Hearings during normal office hours. The OAH accepts filings Monday through Friday between the hours of 8:00 a.m. and 5:00 p.m., except for official state holidays. The petition may be filed by facsimile (fax) or electronic mail by an attached file (with restrictions) - provided the signed original, one (1) copy and a filing fee (if a filing fee is required by NCGS §150B-23.2) is received in the OAH within seven (7) business days following the faxed or electronic transmission. You should contact the OAH with all questions regarding the filing fee and/or the details of the filing process. The mailing address, telephone number, and facsimile number for the OAH are as follows:

Office of Administrative Hearings
6714 Mail Service Center
Raleigh, NC 27699-6714
Telephone: (919) 431-3000 Facsimile: (919) 431-3100

A copy of the petition must also be served on NCDEQ as follows:

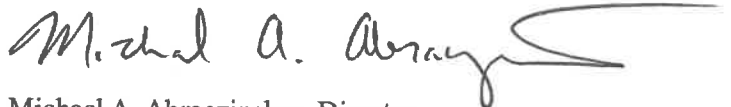
William F. Lane, General Counsel
North Carolina Department of Environmental Quality
1601 Mail Service Center
Raleigh, NC 27699-1601

Please indicate the DAQ case number, as found on Page 1 of this letter, on your petition to OAH.

Failure to exercise one of the options above within thirty (30) days of receipt of this letter, as evidenced by an internal date/time received stamp (not a postmark), will result in this matter being referred to the Attorney General's Office for collection of the penalty through a civil action. Please be advised that additional penalties may be assessed if the violations that are the subject of this action have not been corrected.

If you have any questions concerning this matter, please contact Thaochi Vu at 919-707-8433.

Sincerely,



Michael A. Abraczinskas, Director
Division of Air Quality, NCDEQ

STATE OF NORTH CAROLINA
COUNTY OF MOORE

NORTH CAROLINA
DEPARTMENT OF ENVIRONMENTAL
QUALITY

IN THE MATTER OF:)
RELIANCE PACKAGING)

CASE NUMBER 2019-056

FOR VIOLATION OF:)
15A NCAC 2D .0611 THERMAL)
OXIDER REQUIREMENTS)

CIVIL PENALTY ASSESSMENT

GENERAL CONDITION B.6 - G.S.)
143-215.108(C)(1) PROPER)
OPERATION)

GENERAL STATUTE 143-215.108)
CONSTRUCTION WITHOUT A)
PERMIT)

Acting pursuant to North Carolina General Statutes (G.S.) 143-215.114A, I, Michael A. Abraczinskas, Director of the Division of Air Quality (DAQ), make the following:

I. FINDINGS OF FACT:

A. Reliance Packaging is an offset printing operation located in Aberdeen, Moore County. The facility produces various plastic bag products for items such as gardening mulch.

B. On 17 August 2018, Reliance Packaging was issued Air Quality Permit 10586R00, with an expiration date of 31 July 2026. This permit contains the following conditions:

General Condition B.6, requires that "...In accordance with G.S. 143-215.108(c)(1), the facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air cleaning device(s) and appurtenances."

Specific Condition and Limitation A.8: 15A NCAC 02D .0611 – Thermal Oxidizer Requirements requires that: A) "...VOC, HAP, and TAP emissions shall be controlled as described in the permitted equipment list." The permitted equipment list states that emissions from the 8 Color Flexographic Printing Press PCMC 7991 (Source ID No. ES-1) and 6 Color Flexographic Printing Press Schiavi//Padane Sirio 146 (Source ID No. ES-2) are controlled by the Natural Gas-fired Regenerative Thermal Oxidizer (RTO), and B) the Permittee shall: 1) maintain the temperature in the regenerative thermal oxidizer (RTO) at a minimum of 1,500 degrees Fahrenheit, based on a 3-hour rolling average; 2) continuously monitor and record the temperature in the thermal oxidizer while it is operating; and 3) maintain records on-site and in a form that is readily available for expeditious inspection and review.

- C. On 13 March 2019, Stephen Allen and Abdul Kadir, both with the Fayetteville Regional Office of the Division of Air Quality (FRO DAQ), met with Tom Prots, General Manager, and John Van Der Noord, Maintenance Manager, to conduct a full air quality compliance inspection of Reliance Packaging, in Aberdeen. During the inspection, it was observed and documented that the presses were running while the regenerative thermal oxidizer (RTO) was not operating. Additionally, the facility did not have records for the thermal oxidizer documenting the 1,500 degree (F) temperature had been maintained on a three-hour rolling average for any of the months the facility has been operating.
- D. On 22 March 2019, FRO DAQ sent Reliance Packaging a Compliance Additional Information (CAI) request seeking information to determine the nature and extent of violations observed and documented during the 13 March 2019 inspection.
- E. On 9 April 2019, FRO DAQ received the facility's response to the CAI request including preliminary emissions data and a statement that the press and thermal oxidizer unit had an interlock in place that prevents the press from running if the thermal oxidizer is not operating.
- F. On 17 April 2019, FRO DAQ issued a Notice of Violation/Notice of Recommendation for Enforcement (NOV/NRE) for the following violations:
 - 15A NCAC 02D .0611 – Thermal Oxidizer Requirements
 - 15A NCAC 02Q .0315 – Limitation to Avoid 15A NCAC 02Q .0501
 - 15A NCAC 02Q .0317 – Limitation to Avoid 15A NCAC 02Q .0530
 - General Condition B.6 - G.S. 143-215.108(c)(1) Proper Operation
- G. On 7 May 2019, FRO DAQ received the facility's response to the NOV/NRE. Additional information was also received on 14 May 2019 and 6 June 2019. The information provided included updated VOC emissions calculations that showed the VOC emissions to be less than 100 tons per year, thus showing Reliance Packaging had not violated 15A NCAC 02Q .0315 – Limitation to Avoid 15A NCAC 02Q .0501 nor 15A NCAC 02Q .0317 – Limitation to Avoid 15A NCAC 02Q .0530.
- H. During the inspection on 13 March 2019, Mr. Prots stated the facility was planning on adding a new printing press. Mr. Allen advised that a permit modification would be required and advised Mr. Prots to have the responsible official, Satish Sharma, contact Greg Reeves FRO DAQ Permit Coordinator.
- I. On 20 March 2019, Mr. Allen and Mr. Reeves spoke with Mr. Satish Sharma about the addition of the new printing press. Mr. Reeves advised that the permit modification would require a PE Seal and a zoning determination. Mr. Reeves also stated that construction/installation of the new printing press could not begin until the modified permit was issued by this office.
- J. On 8 May 2019, FRO DAQ received a request for permit modification to add a Natural Gas-fired 8-Color Flexographic printing press Bielloni TELIA 4008 0.794 mmBtu/hr heat input.

- K. On 23 May 2019, Stephen Allen and Abdul Kadir, both of FRO DAQ, conducted a follow-up compliance inspection. They met with facility representatives, Mr. Tom Prots and John Van Der Noord. They observed and documented the installation of a new printing press prior to the permit modification request being completed. The new press was in place with all the control panels installed, supports had been welded in place, and ductwork was in place on top of the press ready to be connected to the existing ductwork controlling ES-1 and ES-2.
- L. On 11 June 2019, FRO DAQ issued an NOV/NRE for violating N.C. General Statute 143-215.108 - Construction of New Air Pollution Sources or Air Cleaning Devices Prior to Obtaining an Air Quality Permit.
- M. On 20 June 2019, FRO DAQ received the facility's response to the NOV/NRE issued on 11 June 2019.
- N. Prior Air Quality History:
 - 3 August 2018: Notice of Violation – N.C. General Statute 143-215.108 - Construction of New Air Pollution Sources or Air Cleaning Devices Prior to Obtaining an Air Quality Permit
- O. The cost of investigation or inspection in this matter totaled \$845.

Based upon the above Findings of Fact, I make the following:

II. CONCLUSIONS OF LAW:

- A. Reliance Packaging was in violation of 15A NCAC 2D .0611, "Thermal Oxidizer Requirements," for failing to operate, monitor, and maintain records for the thermal oxidizer; General Condition B.6 - G.S. 143-215.108(c)(1) Proper Operation for failing to operate the thermal oxidizer at all times the presses were in operation, and G.S. 143-215.108 for installing the new printing press without a permit.
- B. G.S. 143-215.114A provides that a civil penalty of not more than twenty-five thousand dollars (\$25,000) per violation may be assessed against a person who violates or fails to act in accordance with the terms, conditions, or requirements of a permit required by NCGS 143-215.108 or who violates any regulation adopted by the Environmental Management Commission.
- C. G.S. 143-215.3(a)(9) provides that the costs of any investigation or inspection may be assessed against a person who violates or fails to act in accordance with the terms, conditions, or requirements of a permit required by G.S. 143-215.108 or who violates any regulation adopted by the Environmental Management Commission.

Based upon the above Findings of Fact and Conclusions of Law, I make the following:

III. DECISION:

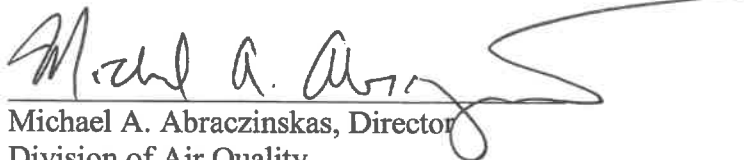
Reliance Packaging is hereby assessed a civil penalty of:

\$ <u>8,229.00</u>	For 3,300 violations of 15A NCAC 2D .0611, "Thermal Oxidizer Requirements."
\$ <u>0</u>	For one (1) violation of General Condition B.6 - G.S. 143-215.108(c)(1) Proper Operation.
\$ <u>1,000.00</u>	For one (1) violation of General Statute 143-215.108 construction without a permit.
\$ <u>9,229.00</u>	TOTAL CIVIL PENALTY , which is <u>0.01</u> percent of the maximum penalty authorized by G.S. 143-215.114A.
\$ <u>\$845</u>	Investigation costs
\$ <u>10,074.00</u>	<u>TOTAL AMOUNT DUE</u>

Pursuant to G.S. 143-215.114A in determining the amount of the penalty, I considered the factors listed in G.S. 143B-282.1(b) and 15A NCAC 2J .0106, which are the following:

- 1) The degree and extent of harm to the natural resources of the State, to the public health, or to private property resulting from the violation(s);
- 2) The duration and gravity of the violation(s);
- 3) The effect on ground or surface water quantity or quality or on air quality;
- 4) The cost of rectifying the damage;
- 5) The amount of money saved by noncompliance;
- 6) Whether the violation was committed willfully or intentionally;
- 7) The prior record of the violator in complying or failing to comply with programs over which the Environmental Management Commission has regulatory authority; and
- 8) The cost to the State of the enforcement procedures.

12/20/19
Date


Michael A. Abraczinskas, Director
Division of Air Quality

STATE OF NORTH CAROLINA

NORTH CAROLINA
ENVIRONMENTAL MANAGEMENT
COMMISSION

County of Moore

FILE NO. DAQ 2019-056

IN THE MATTER OF ASSESSMENT)	REQUEST FOR REMISSION OF CIVIL
OF CIVIL PENALTIES AGAINST)	PENALTIES; WAIVER OF RIGHT TO
Reliance Packaging)	AN ADMINISTRATIVE HEARING
)	AND STIPULATION OF FACTS

Having been assessed civil penalties totaling \$10,074 for violation(s) of:
 NCGS 143-215.108 Control of sources of air pollution; permits required.
 2D .0611 Monitoring Emissions from Other Sources
 2Q .0315 Synthetic Minor Facilities
 2Q .0317 Avoidance Conditions
 NCGS 143-215.108 Control of sources of air pollution; permits required.
 2D .0611 Monitoring Emissions from Other Sources

as set forth in the assessment document of the Director, Division of Air Quality dated December 20, 2019, the undersigned, desiring to seek remission of the civil penalties, does hereby waive right to an administrative hearing in the above-stated matter and does stipulate that the facts are as alleged in the assessment document. The undersigned further understands that all evidence presented in support of remission of this civil penalty must be submitted to the Director of the Division of Air Quality within thirty (30) days of receipt of the notice of assessment. No new evidence in support of a remission request will be allowed after thirty (30) days from the receipt of the notice of assessment.

This the _____ day of _____, 20__

Signature

By

Print Name

Address _____

Telephone (____) _____

JUSTIFICATION FOR REMISSION REQUEST

DAQ Case Number: 2019-056
County: Moore
Violator: Reliance Packaging
Facility ID: 6300110
Amount Assessed: \$10,074 (\$9,229 in penalty and \$845 in investigative costs)

Please use this form when requesting remission of this civil penalty. You must also complete the "Request For Remission, Waiver of Right to an Administrative Hearing, and Stipulation of Facts" form to request remission of this civil penalty. You should attach any documents that you believe support your request and are necessary for the Director to consider in determining your request for remission. Please be aware that a request for remission is limited to consideration of the five factors listed below as they may relate to the reasonableness of the amount of the civil penalty assessed. Requesting remission is not the proper procedure for contesting whether the violation(s) occurred or the accuracy of any of the factual statements contained in the civil penalty assessment document. Pursuant to N.C.G.S. 143B-282.1(c), remission of a civil penalty may be granted only when one or more of the following five factors applies. Please check each factor that you believe applies to your case and provide a detailed explanation, including copies of supporting documents, as to why the factor applies (attach additional pages as needed).

- (a) one or more of the civil penalty assessment factors in N.C.G.S 143B-282.1(b) were wrongfully applied to the detriment of the petitioner (the assessment factors are listed in the civil penalty assessment document);


- (b) the violator promptly abated continuing environmental damage resulting from the violation (i.e., explain the steps that you took to correct the violation and prevent future occurrences);

- (c) the violation was inadvertent or a result of an accident (i.e., explain why the violation was unavoidable or something you could not prevent or prepare for);

- (d) the violator had not been assessed civil penalties for any previous violations;

- (e) payment of the civil penalty will prevent payment for the remaining necessary remedial actions (i.e., explain how payment of the civil penalty will prevent you from performing the activities necessary to achieve compliance).

EXPLANATION:

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery</p>																	
<p>1. Article Addressed to: DAQ 2019-056 CPA 12/20/2019</p> <p>Mr. Satish Sharma Reliance Packaging 175 Anderson St. Aberdeen, NC 28315</p>  <p>9590 9402 5370 9189 5932 10</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p> <div style="border: 1px solid black; padding: 5px; text-align: center;"> <p>RECEIVED</p> <p>JAN 2 2020</p> <p>AIR MAIL</p> </div>																	
<p>2. Article Number (Transfer from service label) 7018 2290 0000 5334 5328</p>	<p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input checked="" type="checkbox"/> Return Receipt for Merchandise</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>		<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input checked="" type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																	
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™																	
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<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)																		
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>																

AGENDA ITEM: _____ REQUEST FOR REMISSION OF CIVIL PENALTY BY:

**Reliance Packaging
DAQ 2019-056
Moore County**

EXPLANATION: On 12/20/19, the Division of Air Quality, assessed a total penalty of \$10,074 (Civil Penalty of \$9,229 plus investigative costs of \$845) against Reliance Packaging, for:

- 2D .0611 Monitoring Emissions from Other Sources
- 2D .0611 Monitoring Emissions from Other Sources
- NCGS 143-215.108 Control of sources of air pollution; permits required.
- 2Q .0315 Synthetic Minor Facilities
- 2Q .0317 Avoidance Conditions
- NCGS 143-215.108 Control of sources of air pollution; permits required.
- NCGS 143-215.108 Control of sources of air pollution; permits required.
- NCGS 143-215.108 Control of sources of air pollution; permits required.
- NCGS 143-215.108 Control of sources of air pollution; permits required.
- NCGS 143-215.108 Control of sources of air pollution; permits required.

On 1/23/20, Reliance Packaging requested remission and waived the right to an administrative hearing by stipulating the facts were as alleged in the assessment document.

RECOMMENDATION: a. The Division of Air Quality opposes any remission or mitigation of the civil penalty and recommends the initial assessment in the amount of \$10,074 be upheld.

b. _____ The Division of Air Quality grants the request for remission of civil penalties and recommends the following penalty amounts apply:

\$ _____ Remitted Civil Penalty Amount

\$ _____ Remitted Investigative Costs

\$ _____ Total Penalty Amount

REMISSION FACTORS

- o Whether one or more of the civil penalty assessment factors were wrongly applied to the detriment of the petitioner;
- o Whether the violator promptly abated continuing environmental damage resulting from the violation;
- o Whether the violation was inadvertent or a result of an accident;
- o Whether the violator had been assessed civil penalties for any previous violations; and
- o Whether payment of the civil penalty will prevent payment for the remaining necessary remedial actions.

ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL A. ABRACZINSKAS
Director



NORTH CAROLINA
Environmental Quality

CERTIFIED MAIL RETURN RECEIPT REQUESTED

7019 1120 0002 0066 0933

April 23, 2020

Mr. Satish Sharma, President
Reliance Packaging
175 Anderson St.
Aberdeen, NC 28315

SUBJECT: Request for Remission of Civil Penalty Pursuant to NCGS 143-215.114A(e)

File No.: DAQ 2019-056
Violator: Reliance Packaging
County: Moore
Facility ID: 6300110

Dear Mr. Sharma:

Pursuant to authority delegated to me by NCGS 143-215.114A.(g), I have considered the information submitted in support of your request for remission in accordance with NCGS 143-215.114A.(e), and have not found grounds to modify your assessment of \$10,074 (Civil Penalty of \$9,229 plus Investigative Costs of \$845). However, I will allow you to pay the penalty in installments. If you choose this option, please contact Amy Vanderkop at 919-707-8432 to arrange for a payment plan.

Should you choose to pay the full penalty, you may send a check or money order to the North Carolina Department of Environmental Quality (NCDEQ). Please submit payment within thirty (30) days of receipt of this letter to the attention of:

Enforcement Group - Payment
Department of Environmental Quality
Division of Air Quality
1641 Mail Service Center
Raleigh, North Carolina 27699-1641

Please be advised, that it is the policy for NCDEQ to charge and collect a processing fee of \$25.00 for checks on which payment has been refused by the bank because of insufficient funds or because of an invalid bank account.

If payment is not received within thirty (30) days of receipt of this letter, in accordance with NCGS 143-215.114A.(e), your request for remission of the civil penalty with supporting documents and my recommendation to deny the request with supporting documentation will be delivered to the North Carolina Environmental Management Commission's (EMC) Civil Penalty Remission Committee (Committee) for final agency decision.



North Carolina Department of Environmental Quality | Division of Air Quality
217 West Jones Street, Suite 4000 | 1641 Mail Service Center | Raleigh, NC 27699-1641
919 707 8400 T

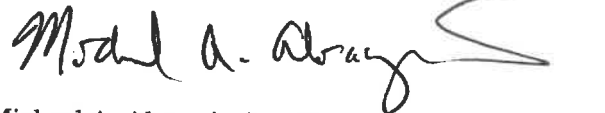
If you desire to make an oral presentation to the Committee on why your request for remission meets one or more of the five statutory factors you were asked to address, you must complete and return the enclosed form within thirty (30) days of receipt of this letter. Please mail the completed form to:

Enforcement Group - EMC Request
Department of Environmental Quality
Division of Air Quality
1641 Mail Service Center
Raleigh, North Carolina 27699-1641

If you request to orally present your case to the EMC, you will be notified by certified mail of the date, time, and place that your oral presentation can be made. Otherwise, the final decision on your request for remission will be made by the Committee based on the written record.

Thank you for your cooperation in this matter. If you have any questions about this letter, please contact Thaochi Vu at 919-707-8433.

Sincerely,



Michael A. Abraczinskas, Director
Division of Air Quality, NCDEQ

Enclosure: Request for Oral Presentation

cc: Heather Carter, Regional Supervisor Fayetteville Regional Office
Enforcement File (DAQ 2019-056)

STATE OF NORTH CAROLINA

ENVIRONMENTAL MANAGEMENT
COMMISSION

COUNTY OF Moore

DAQ Case Number: 2019-056

IN THE MATTER OF ASSESSMENT)
OF CIVIL PENALTIES AGAINST:)
Reliance Packaging)
)

REQUEST FOR ORAL PRESENTATION

I hereby request to make an oral presentation before the Environmental Management Commission's (EMC) Committee on Civil Penalty Remissions in the matter of the case noted above. In making this request, I assert that I understand all of the following statements:

- Making a presentation will require the presence of myself or my representative during a Committee meeting held in Raleigh, North Carolina.
- My presentation will be limited to discussion of issues and information submitted in my original remission request. and because no factual issues are in dispute, my presentation will be limited to three (3) minutes in length.

The North Carolina State Bar's Authorized Practice of Law Committee has ruled that the appearance in a representative capacity at quasi-judicial hearings or proceedings is limited to lawyers who are active members of the bar. Proceedings before the Committee on Remission are quasi-judicial. You should consider how you intend to present your case to the Committee in light of the State Bar's opinion and whether anyone will be speaking in a representative capacity for you or a business or government entity. **If you or your representative would like to speak before the Committee, you must complete and return this form within thirty (30) days of receipt of this letter.**

Depending on your status as an individual, corporation, partnership, or municipality, the State Bar's Opinion affects how you may proceed with your oral presentation. See www.ncbar.com/ethics. Authorized Practice Advisory Opinion 2006-1 and 2007 Formal Ethics Opinion 3.

- If you are an individual or business owner, then you do not need legal representation before the Committee; however, if you intend on having another individual speak on your behalf regarding the factual situations, such as an expert, engineer or consultant, then you must also be present at the meeting in order to avoid violating the State Bar's Opinion on the unauthorized practice of law.
- If you are a corporation, partnership or municipality, then your representative must consider the recent State Bar's Opinion and could be considered practicing law without a license if he or she is not a licensed attorney. Non-lawyers may present facts but must not offer legal representation or legal opinion.

If you choose to request an oral presentation please make sure that signatures on the previously submitted Remission Request form and this Oral Presentation Request form are: 1) for individuals and business owners, your own signature and 2) for corporations, partnerships and municipalities, signed by individuals who would not violate the State Bar's Opinion on the unauthorized practice of law.

Also, be advised that the Committee on Civil Penalty Remissions may choose not to proceed with hearing your case if the Committee is informed that a violation of the State Bar occurs. This the _____ day of _____, 20____.

SIGNATURE

TITLE (President, Owner, etc.)

ADDRESS

TELEPHONE (____) _____

ALERT: DUE TO LIMITED TRANSPORTATION AVAILABILITY AS A RESULT OF NATIONWIDE CO...



FAQs >

Track Another Package +

Tracking Number: 70191120000200660933

Remove X

Your item was delivered to an individual at the address at 4:17 pm on April 27, 2020 in ABERDEEN, NC 28315.

Delivered

April 27, 2020 at 4:17 pm
Delivered, Left with Individual
ABERDEEN, NC 28315

Get Updates v

Feedback

Text & Email Updates



Tracking History



April 27, 2020, 4:17 pm
Delivered, Left with Individual
ABERDEEN, NC 28315

Your item was delivered to an individual at the address at 4:17 pm on April 27, 2020 in ABERDEEN, NC 28315.

April 27, 2020, 9:56 am
Out for Delivery
ABERDEEN, NC 28315

April 27, 2020, 9:45 am

Arrived at Unit
ABERDEEN, NC 28315

April 26, 2020

In Transit to Next Facility

April 25, 2020, 6:00 pm

Departed USPS Regional Facility
FAYETTEVILLE NC DISTRIBUTION CENTER ANNEX

April 25, 2020, 1:24 pm

Arrived at USPS Regional Facility
FAYETTEVILLE NC DISTRIBUTION CENTER ANNEX

April 24, 2020, 8:41 pm

Departed USPS Regional Facility
RALEIGH NC DISTRIBUTION CENTER

April 24, 2020, 6:03 pm

Arrived at USPS Regional Facility
RALEIGH NC DISTRIBUTION CENTER

Feedback

Product Information



See Less ^

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs

Σ
Reliance Packaging
Of Sigma Plastics Group

January 23, 2020

Enforcement Group – Remission
Department of Environmental Quality
Division of Air Quality
1641 Mail Service Center
Raleigh, NC 27699-1641

A rectangular stamp with the word "COPY" in a bold, sans-serif font. The letter "C" is enclosed in a small square box.

Subject: Justification for Remission Request
Reliance Packaging, Permit No. 10586/R00
Aberdeen, NC Moore County, Facility ID: 6300110
DAQ Case Number: 2019-056

Dear Mr. Abraczinskas:

Thank you for the opportunity to present this Remission Request in response to the Civil Penalty Assessment received by Reliance Packaging on December 26, 2019. Reliance Packaging (herein referred to as "Reliance") is filing this Justification for Remission Request that is comprised of the following:

- ATTACHMENT 1 - "Request for Remission, Waiver of Right to an Administrative Hearing, and Stipulation of Facts" Form
- ATTACHMENT 2 - Justification for Remission Request Form
- Supplemental Information

The remainder of this letter is the additional "Supplemental Information" referred to in the Justification for Remission Request Form, by factor.

(a) *One or more of the civil penalty assessment factors in NCGS 143B-282.1(b) were wrongfully applied to the detriment of the petitioner.*

Reliance believes that the following factors were mis-applied or the application of how the factors were applied is unclear for the violations of 15A NCAC 2D.0611:

- (1) The degree and extent of harm to the natural resources of the State, to the public health, or to private property resulting from the violations;
- (2) The duration and gravity of the violations;
- (3) The effect on air quality;
- (5) The amount of money saved by non-compliance;

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(6) Whether the violation was committed willfully or intentionally;

While Reliance stipulates that the proper monitoring, recording, and recordkeeping data were not properly being kept during the period of September 2018 through March 2019, it is unclear how the number of violations of 15A NCAC 2D.0611 of 3,300 was arrived at, or how the corresponding penalty took into account these factors. In fact, during telephone conversations regarding the progress of these violations, representatives of NCDEQ's Regional Division of Air Quality indicated that there were going to be open communication of the penalty assessment progress and status. Unfortunately, the receipt of this Civil Penalty Assessment for Violations was the first opportunity for Reliance to review and discuss the penalty assessment.

As written in the Civil Penalty Assessment document, Reliance has no opportunity to assert the mis-application of the factors because there is no information indicating how the NCDEQ applied the factors to the given penalty assessment for violations of 15A NCAC 2D.0611.

As a matter of fact, Reliance provided NCDEQ Regional personnel with estimates of shift hours (hours when Reliance employees were paid to perform some sort of work on the presses, including operation, maintenance, repair, make-ready and other functions). This email correspondence with NCDEQ is included in Attachment 3 (email from Mr. Satish Sharma to Ms. Heather Carter, dated July 17, 2019). It should further be noted that the last correspondence and direct communication on the subject of these violations was Ms. Carter's response, also included in Attachment 3, a day later on July 18, 2019.

Further, the quantity of the penalty assessed appears substantially higher than other violations of minor source permit requirements, although it is impossible to draw a conclusion with the information currently provided to Reliance on the penalty assessment.

(d) The violator had not been assessed civil penalties for any previous violations

This factor applies to the violation of General Statute 143-215.108, construction without a permit and the violations of 15A NCAC 02D.0611. At the core of the construction without a permit violation was Reliance's understanding of what constitutes "construction" under NCDEQ rules. Reliance had no intentions of making any of the required final connections (exhaust ductwork, connecting electricity to the observed installed control panels, control system configurations, etc.), and was not aware that taking delivery of a used press and some other basic site preparation activities (placement of unit, support welding, etc.) was in violation of the NCDEQ rules. Reliance is now well aware of this fact, and appreciates the NCDEQ staff discussing what constitutes "construction" under the rules.

Although Reliance acknowledges the fact that the noted violation for commencing installation of a press prior to issuance of a valid permit from NCDEQ is the second of its kind, the factor under consideration as stated apparently provides relief for violations for which prior assessed civil penalties have not been assessed, which is the case for Reliance. The Civil Penalty Assessment document does not state or

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show whether any consideration for this factor was applied to the \$1,000 assessed penalty figure.

Further, if there is consideration for reducing the civil penalty for not having been assessed a penalty prior, then it should also apply to the violations of 15A NCAC 02D.0611.

We appreciate your attention to this request, and Reliance is looking forward to continuing to work with NCDEQ on air quality compliance. As stated in prior correspondence, these were not intentional violations.

If you have any questions regarding this request, please contact me using my contact information below, or our recently engaged environmental consultant Chris Maye of CMI at 215-699-4800x112 or cell at 215-692-3385.

Sincerely,



Satish Sharma
Reliance Packaging
175 Anderson Street
Aberdeen, NC 28315

Enclosures:

- ATTACHMENT 1 – Request for Remission, Waiver of Right to an Administrative Hearing, and Stipulation of Facts” Form
- ATTACHMENT 2 – Justification for Remission Request Form
- ATTACHMENT 3 – July 2019 Email Correspondence between Ms. Heather Carter and Mr. Satish Sharma



ATTACHMENT 1

Request for Remission, Waiver of Right to an Administrative Hearing, and Stipulation of
Facts" Form

STATE OF NORTH CAROLINA

NORTH CAROLINA
ENVIRONMENTAL MANAGEMENT
COMMISSION

County of Moore

FILE NO. DAQ 2019-056

IN THE MATTER OF ASSESSMENT)	REQUEST FOR REMISSION OF CIVIL
OF CIVIL PENALTIES AGAINST)	PENALTIES; WAIVER OF RIGHT TO
Reliance Packaging)	AN ADMINISTRATIVE HEARING
)	AND STIPULATION OF FACTS

Having been assessed civil penalties totaling \$10,074 for violation(s) of:

NCGS 143-215.108 Control of sources of air pollution; permits required.

2D .0611 Monitoring Emissions from Other Sources

2Q .0315 Synthetic Minor Facilities

2Q .0317 Avoidance Conditions

NCGS 143-215.108 Control of sources of air pollution; permits required.

2D .0611 Monitoring Emissions from Other Sources

as set forth in the assessment document of the Director, Division of Air Quality dated December 20, 2019, the undersigned, desiring to seek remission of the civil penalties, does hereby waive right to an administrative hearing in the above-stated matter and does stipulate that the facts are as alleged in the assessment document. The undersigned further understands that all evidence presented in support of remission of this civil penalty must be submitted to the Director of the Division of Air Quality within thirty (30) days of receipt of the notice of assessment. No new evidence in support of a remission request will be allowed after thirty (30) days from the receipt of the notice of assessment.

This the 25th day of January, 2020



Signature

By

Satish Sharma

Print Name

Address 175
170 Anderson Street
Aberdeen, NC 28315 (Moore County)

Telephone (910) 914-2561



ATTACHMENT 2

Justification for Remission Request Form

JUSTIFICATION FOR REMISSION REQUEST

DAQ Case Number: 2019-056
County: Moore
Violator: Reliance Packaging
Facility ID: 6300110
Amount Assessed: \$10,074 (\$9,229 in penalty and \$845 in investigative costs)

Please use this form when requesting remission of this civil penalty. You must also complete the "Request For Remission, Waiver of Right to an Administrative Hearing, and Stipulation of Facts" form to request remission of this civil penalty. You should attach any documents that you believe support your request and are necessary for the Director to consider in determining your request for remission. Please be aware that a request for remission is limited to consideration of the five factors listed below as they may relate to the reasonableness of the amount of the civil penalty assessed. Requesting remission is not the proper procedure for contesting whether the violation(s) occurred or the accuracy of any of the factual statements contained in the civil penalty assessment document. Pursuant to N.C.G.S. 143B-282.1(c), remission of a civil penalty may be granted only when one or more of the following five factors applies. Please check each factor that you believe applies to your case and provide a detailed explanation, including copies of supporting documents, as to why the factor applies (attach additional pages as needed).

- (a) one or more of the civil penalty assessment factors in N.C.G.S 143B-282.1(b) were wrongfully applied to the detriment of the petitioner (the assessment factors are listed in the civil penalty assessment document);
- (b) the violator promptly abated continuing environmental damage resulting from the violation (i.e., explain the steps that you took to correct the violation and prevent future occurrences);
- (c) the violation was inadvertent or a result of an accident (i.e., explain why the violation was unavoidable or something you could not prevent or prepare for);
- (d) the violator had not been assessed civil penalties for any previous violations;
- (e) payment of the civil penalty will prevent payment for the remaining necessary remedial actions (i.e., explain how payment of the civil penalty will prevent you from performing the activities necessary to achieve compliance).

EXPLANATION:

(b) not selected due to obvious and apparent actions to abate emissions and improve recordkeeping. Further explanation included in cover letter discussion.



ATTACHMENT 3

July 2019 Email Correspondence between Ms. Heather Carter and Mr. Satish Sharma

Chris Maye

From: Carter, Heather <Heather.Carter@ncdenr.gov>
Sent: Thursday, July 18, 2019 2:37 PM
To: Satish Sharma
Cc: Chris Maye; tom@reliancepkg.com; Allen, Stephen C; Lowery-jacobs, Evangelyn
Subject: RE: [External] Compliance Additional Information Request

Thank you for your response, Mr. Sharma.

As far as tracking this type of info for the future, it is and will continue to be important to be able to document press operating times and also RTO operating times to prove that the RTO was operating at all times the presses were operating.

Currently the number of hours the presses operated from Sept through March is directly relevant to the number of violations of 2D .0611 for failing to monitor and record the 3-hr rolling avg temperature.



Heather Carter
Regional Supervisor
Division of Air Quality, Fayetteville Regional Office
225 Green Street, Suite 714 910.433.3361 (Office)
Fayetteville, NC 28301-5043
Heather.Carter@ncdenr.gov

Email correspondence to and from this address is subject to the North Carolina Public Records Law and may be disclosed to the public.

From: Satish Sharma [mailto:ssharma@reliancepkg.com]
Sent: Wednesday, July 17, 2019 4:32 PM
To: Carter, Heather <Heather.Carter@ncdenr.gov>
Cc: 'Chris Maye' <cmaye@complianceplace.com>; tom@reliancepkg.com; Allen, Stephen C <stephen.allen@ncdenr.gov>
Subject: RE: [External] Compliance Additional Information Request

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to report.spam@nc.gov

Dear Ms. Carter:

As discussed previously, hours of press operation are not currently tracked by the facility, partly because this is not currently a requirement of any current permit. Without knowing the context of how this information will be used or is relevant, the following is a list of shift hours per month for the period in question:

Sept '18 – 636 hours
Oct '18 – 709 hours
Nov '18 - 650 hours
Dec '18 – 656 hours
Jan '19 – 708 hours
Feb '19 – 576 hours
March '19 – 600 hours

This data represents an upper bound of hours a press was running; it does not account for press operation downtime, time due to job changeovers (including make ready), and other times when a shift was working at the plant and the presses were not operating.

It would be useful to know how this information is going to be used, as tracking press operation time may be a parameter the facility would consider tracking if there were reasons to do so.

Thank you, and if you need anything else, please let me know.

Kind Regards,

Satish Sharma

Reliance Packaging LLC

A member of the SIGMA PLASTICS GROUP of companies
155 Anderson Street • Aberdeen, NC 28315
TEL: 910-944-2561 • FAX: 910-944-9208
www.reliancepkg.com

From: Carter, Heather [<mailto:Heather.Carter@ncdenr.gov>]
Sent: Wednesday, July 17, 2019 11:16 AM
To: Satish Sharma
Cc: Chris Maye; tom@reliancepkg.com; Allen, Stephen C
Subject: RE: [External] Compliance Additional Information Request

Just a quick reminder that we have not received the data requested below.
We are comfortable estimating, but an actual accounting of operational hours may be in your best interest.
Please provide the requested data no later than COB today.



Heather Carter
Regional Supervisor
Division of Air Quality, Fayetteville Regional Office
225 Green Street, Suite 714 910.433.3361 (Office)
Fayetteville, NC 28301-5043
Heather.Carter@ncdenr.gov

Every correspondence to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties.

From: Satish Sharma [<mailto:ssharma@reliancepkg.com>]
Sent: Tuesday, July 2, 2019 12:22 PM
To: Carter, Heather <Heather.Carter@ncdenr.gov>
Cc: Chris Maye <cmaye@complianceplace.com>; tom@reliancepkg.com; Allen, Stephen C <stephen.allen@ncdenr.gov>
Subject: Re: [External] Compliance Additional Information Request

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to report.spam@nc.gov

Ms Carter,

We are closing the factory this week for the July 4th holiday but will gather the required information and send to you by next week.

Thank you,

Satish Sharma
Reliance Packaging

On Jul 2, 2019, at 11:24 AM, Carter, Heather <Heather.Carter@ncdenr.gov> wrote:

Mr. Sharma/Mr. Maye,

I think we asked before about hours of printing press operations by month, but we let it slip off our radar.

At this time we need you to submit daily or monthly hours of printing press operations from September 2018 through March 2019.

Please response as soon as possible with this information.

Thank you.

<image001.jpg>

From: Satish Sharma [<mailto:ssharma@reliancepkg.com>]

Sent: Thursday, April 4, 2019 1:09 PM

To: Carter, Heather <Heather.Carter@ncdenr.gov>; Allen, Stephen C <stephen.allen@ncdenr.gov>

Cc: 'Chris Maye' <cmaye@CompliancePlace.com>; tom@reliancepkg.com

Subject: [External] Compliance Additional Information Request

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to report.spam@nc.gov

Ms. Heather Carter

Regional Supervisor – Fayetteville Regional Office

NCDEQ, Division of Air Quality

225 Green Street, Suite 714

Fayetteville, NC 28301-5094

Reliance Packaging, Permit No. 10586/R00

Aberdeen, NC Moore County, Facility ID: 6300110

Dear Ms. Carter,

Please find attached information as requested.

We have also sent a hard copy of this response to your attention by mail.

Thank you,

Satish Sharma

Reliance Packaging LLC

A member of the SIGMA PLASTICS GROUP of companies

155 Anderson Street • Aberdeen, NC 28315

TEL: 910-944-2561 • FAX: 910-944-9208

STATE OF NORTH CAROLINA

ENVIRONMENTAL MANAGEMENT
COMMISSION

COUNTY OF Moore

DAQ Case Number: 2019-056

IN THE MATTER OF ASSESSMENT)
OF CIVIL PENALTIES AGAINST:)
Reliance Packaging)
)

REQUEST FOR ORAL PRESENTATION

I hereby request to make an oral presentation before the Environmental Management Commission's (EMC) Committee on Civil Penalty Remissions in the matter of the case noted above. In making this request, I assert that I understand all of the following statements:

- Making a presentation will require the presence of myself or my representative during a Committee meeting held in Raleigh, North Carolina.
- My presentation will be limited to discussion of issues and information submitted in my original remission request, and because no factual issues are in dispute, my presentation will be limited to three (3) minutes in length.

The North Carolina State Bar's Authorized Practice of Law Committee has ruled that the appearance in a representative capacity at quasi-judicial hearings or proceedings is limited to lawyers who are active members of the bar. Proceedings before the Committee on Remission are quasi-judicial. You should consider how you intend to present your case to the Committee in light of the State Bar's opinion and whether anyone will be speaking in a representative capacity for you or a business or government entity. **If you or your representative would like to speak before the Committee, you must complete and return this form within thirty (30) days of receipt of this letter.**

Depending on your status as an individual, corporation, partnership, or municipality, the State Bar's Opinion affects how you may proceed with your oral presentation. See www.ncbar.com/ethics. Authorized Practice Advisory Opinion 2006-1 and 2007 Formal Ethics Opinion 3.

- If you are an individual or business owner, then you do not need legal representation before the Committee; however, if you intend on having another individual speak on your behalf regarding the factual situations, such as an expert, engineer or consultant, then you must also be present at the meeting in order to avoid violating the State Bar's Opinion on the unauthorized practice of law.
- If you are a corporation, partnership or municipality, then your representative must consider the recent State Bar's Opinion and could be considered practicing law without a license if he or she is not a licensed attorney. Non-lawyers may present facts but must not offer legal representation or legal opinion.

If you choose to request an oral presentation please make sure that signatures on the previously submitted Remission Request form and this Oral Presentation Request form are: 1) for individuals and business owners, your own signature and 2) for corporations, partnerships and municipalities, signed by individuals who would not violate the State Bar's Opinion on the unauthorized practice of law.

Also, be advised that the Committee on Civil Penalty Remissions may choose not to proceed with hearing your case if the Committee is informed that a violation of the State Bar occurs. This the 29th day of May, 2020.

SIGNATURE

President

TITLE (President, Owner, etc.)

ADDRESS

175 Anderson St

Aberdeen, NC 28315

TELEPHONE (910) 944-2561



RELIANCE PACKAGING LLC
175 Anderson St
Aberdeen NC 28315-2141

CHARLOTTE
NC 282
02 JUN '20
PM 6 L



\$5.75⁰
US POSTAGE
FIRST-CLASS
FROM 28315
06/02/2020
stamps
endicia



062S0012762826



Enforcement Group - EMC Request
Department of Environmental Quality
Division of Air Quality
1641 Mail Service Center
Raleigh NC 27699-1641

MISCELLANEOUS DOCUMENTS

Department of Environmental Quality
Division of Air Quality

Fayetteville Regional Office
225 Green Street, Suite 714
Fayetteville, NC 28301
(910) 433-3300 Phone (910) 485-7467 Fax

18 July 2019

MEMORANDUM

TO: Amy Vanderkop,
THROUGH: Heather Carter, Regional Supervisor
FROM: Evangelyn Lowery-Jacobs, Acting Compliance Coordinator
WRITTEN BY: Stephen Allen, Environmental Specialist
SUBJECT: Normal Track Enforcement Case
Reliance Packaging, LLC
Aberdeen, NC, Moore County 6/63-00110
Case No. 2019-056

Responsible party or Contact name and mailing address:

Satish Sharma
155 Anderson Street
Aberdeen, NC 28315

Type and number of violations:

- A) 3,300 violations of 15A NCAC 02D .0611 – Thermal Oxidizer Requirements
- B) One violation of General Condition B.6 - G.S. 143-215.108(c)(1) Proper Operation
- C) One violation of N.C. General Statute 143-215.108 - Construction of New Air Pollution Sources or Air Cleaning Devices Prior to Obtaining an Air Quality Permit

Materials or equipment involved in violation:

CD1: Natural Gas-fired Regenerative Thermal Oxidizer 4 mmBtu/hr maximum heat input
ES-3: Natural Gas-fired 8-Color Flexographic printing press Bielloni TELIA 4008 0.794 mmBtu/hr heat input

Dates of Violation Discovery:

13 March 2019
23 May 2019

Date of NOV/NRE:

17 April 2019
11 June 2019

Investigative Costs for action:

\$ \$645

Recommendation of Regional Office:

Assess per DAQ Penalty Tree, section 5.7 (2D .0611), 6.3 (GS 143.215.108 (g)(1)) and 1.1 (GS 143-215.108).

B. b

Other Information:

Factors to consider in determining number of 3-hr rolling average violations of 2D .0611:

- Reliance Packaging response dated April 4, 2019 shows RTO operating in the beginning of Sept 2018; and says press operates 6-7 days/week 24 hrs a day.
- Reliance Packaging response dated May 3, 2019 shows April 2, 2019 as data recorder install date.
- Reliance Packaging email response dated July 17, 2019, shows maximum possible press operating times as 4535 hrs from Sept 1, 2018 through March 30, 2019. From the email:

Sept '18 - 636 hours	Jan '19 - 708 hours
Oct '18 - 709 hours	Feb '19 - 576 hours
Nov '18 - 650 hours	March '19 - 600 hours
Dec '18 - 656 hours	

As a conservative measure FRO DAQ decided to calculate the number of violations as follows:

Sept 1st - April 1st = 30 weeks x 5 days/week = 150 days x 22 rolling 3-hr periods/day = 3,300 violations

*S.F. @ 11K
3,299
1st one*

\$

*S.F.
3,299
11,000
41,299
\$4,299*

ADDENDUM A: COST OF THE ENFORCEMENT ACTION

COST OF THE INVESTIGATION:

Investigators	Hours	Hourly Salary	Subtotal
Stephen Allen	8.0	\$34.77	\$ 278.16
Abdul Kadir	3.0	\$36.19	\$108.57

Transportation	Investigators	Miles	Cost at \$ 0.33 per mile
13 March 2019	Stephen Allen	82	\$27.06
23 May 2019	Stephen Allen	82	\$27.06

COST OF PREPARATION OF THE ENFORCEMENT ACTION:

Preparer	Hours	Hourly Salary	Subtotal
Stephen Allen	3	\$34.77	\$104.31

REGIONAL OFFICE COSTS (TOTAL):

\$545.16

ADMINISTRATIVE COST:

~~\$100~~ 300

TOTAL INVESTIGATIVE COST:

\$645 845?

ADDENDUM B: SUPPORTING DOCUMENTATION

1. Inspection report from compliance inspection conducted on 13 March 2019.
2. Compliance Additional Information request letter issued by FRO DAQ on 22 March 2019 with green card receipt dated 25 March 2019.
3. Compliance Additional Information request response received from facility received on 9 April 2019.
4. Notice of Violation / Notice of Recommendation for Enforcement (NOV/NRE) issued to Reliance Packaging, dated 17 April 2019, letter was returned as undeliverable. A copy of the letter was emailed, and a response was received on 7 May 2019.
5. Inspection report and photos from follow-up compliance inspection conducted on 23 May 2019.
6. Notice of Violation / Notice of Recommendation for Enforcement (NOV/NRE) issued to Reliance Packaging, dated 11 June 2019, with green card receipt dated 13 June 2019.
7. Facility's response to NOV/NRE, received on 20 June 2019.
8. Printouts of email correspondence.

As a conservative measure FRO DAQ decided to calculate the number of violations as follows:
Sept 1st – April 1st = 30 weeks x 5 days/week = 150 days x 22 rolling 3-hr periods/day = 3,300 violations
2018 2019

3,302

149

3% of 11K
= 330/day

22 rolling 3 hrs

$$30 / 22 = 1.36 \text{ hr}^3$$

$$1.36 \times 3,299 = 4,486$$

+ 1st violation 1K

5,486

+ 1K → for grand total part

1.36

\$6,486

~~4,486~~
~~5,486~~

↑ 50% due to aggrandizing factor

= 8,229

installed, supports had been welded in place, and ductwork was in place on top of the press ready to be connected to the existing ductwork controlling ES-1 and ES-2.

On 11 June 2019, FRO DAQ issued an NOV/NRE for violating N.C. General Statute 143-215.108 - Construction of New Air Pollution Sources or Air Cleaning Devices Prior to Obtaining an Air Quality Permit. **A permit version R01 was issued for this new equipment on 6/20/2019.**

Compliance History / Prior Violations

Violation type, date, & amount assessed: _____

3 August 2018: Notice of Violation – N.C. General Statute 143-215.108 - Construction of New Air Pollution Sources or Air Cleaning Devices Prior to Obtaining an Air Quality Permit

Assessment Factors

- *Degree/Extent of Harm:* _____
- *Willfulness or negligence:* _____
- *Effectiveness of corrective action:* _____

Company Response

On 7 May 2019, FRO DAQ received the facility's response to the 4/17/2019 NOV/NRE. Additional information was also received on 14 May 2019 and 6 June 2019. The information provided included updated VOC emissions calculations that showed the VOC emissions to be less than 100 tons per year, thus showing Reliance Packaging had not violated 15A NCAC 02Q .0315 – Limitation to Avoid 15A NCAC 02Q .0501 nor 15A NCAC 02Q .0317 – Limitation to Avoid 15A NCAC 02Q .0530.

On 20 June 2019, FRO DAQ received the facility's response to the NOV/NRE issued on 11 June 2019. The facility stated that the press components were only placed in position; no permanent changes to the site have been made. The electric power and natural gas have not been connected. Therefore, it is impossible to operate.

Recommended Penalty – Amount and Rationale

Economic Benefit to the violator (not applicable if left blank): _____

Region recommends ^{SSCB → 7.1} **5.7** for 2D .0611, **6.3** for B6, and **1.1** for without obtaining air permit.

Factors to consider in determining number of 3-hr rolling average violations of 2D .0611:

- Reliance Packaging response dated April 4, 2019 shows RTO operating in the beginning of Sept 2018; and says press operates 6-7 days/week 24 hrs a day.
- Reliance Packaging response dated May 3, 2019 shows April 2, 2019 as data recorder install date.
- Reliance Packaging email response dated July 17, 2019, shows maximum possible press operating times as 4535 hrs from Sept 1, 2018 through March 30, 2019. From the email:

Sept '18 – 636 hours	Jan '19 – 708 hours
Oct '18 – 709 hours	Feb '19 – 576 hours
Nov '18 - 650 hours	March '19 – 600 hours
Dec '18 – 656 hours	

On 13 March 2019, Stephen Allen and Abdul Kadir, both with the Fayetteville Regional Office of the Division of Air Quality (FRO DAQ), met with Tom Prots, General Manager, and John Van Der Noord, Maintenance Manager, to conduct a full air quality compliance inspection of Reliance Packaging, in Aberdeen. During the inspection, it was observed and documented that the presses were running while the regenerative thermal oxidizer (RTO) was not operating. Additionally, the facility did not have records for the thermal oxidizer documenting the 1,500-degree (F) temperature had been maintained on a three-hour rolling average for any of the months the facility has been operating.

On 22 March 2019, FRO DAQ sent Reliance Packaging a Compliance Additional Information (CAI) request seeking information to determine the nature and extent of violations observed and documented during the 13 March 2019 inspection.

On 9 April 2019, FRO DAQ received the facility's response to the CAI request including preliminary emissions data and a statement that the press and thermal oxidizer unit had an interlock in place that prevents the press from running if the thermal oxidizer is not operating.

On 17 April 2019, FRO DAQ issued a Notice of Violation/Notice of Recommendation for Enforcement (NOV/NRE) for the following violations:

- 15A NCAC 02D .0611 – Thermal Oxidizer Requirements
- 15A NCAC 02Q .0315 – Limitation to Avoid 15A NCAC 02Q .0501
- 15A NCAC 02Q .0317 – Limitation to Avoid 15A NCAC 02Q .0530
- General Condition B.6 - G.S. 143-215.108(c)(1) Proper Operation

On 7 May 2019, FRO DAQ received the facility's response to the NOV/NRE. Additional information was also received on 14 May 2019 and 6 June 2019. The information provided included updated VOC emissions calculations that showed the VOC emissions to be less than 100 tons per year, thus showing Reliance Packaging had not violated 15A NCAC 02Q .0315 – Limitation to Avoid 15A NCAC 02Q .0501 nor 15A NCAC 02Q .0317 – Limitation to Avoid 15A NCAC 02Q .0530.

During the inspection on 13 March 2019, Mr. Prots stated the facility was planning on adding a new printing press. Mr. Allen advised that a permit modification would be required and advised Mr. Prots to have the responsible official, Satish Sharma, contact Greg Reeves FRO DAQ Permit Coordinator.

On 20 March 2019, Mr. Allen and Mr. Reeves spoke with Mr. Satish Sharma about the addition of the new printing press. Mr. Reeves advised that the permit modification would require a PE Seal and a zoning determination. Mr. Reeves also stated that construction/installation of the new printing press could not begin until the modified permit was issued by this office.

On 8 May 2019, FRO DAQ received a request for permit modification to add a Natural Gas-fired 8-Color Flexographic printing press Bielloni TELIA 4008 0.794 mmBtu/hr heat input.

On 23 May 2019, Stephen Allen and Abdul Kadir, both of FRO DAQ, conducted a follow-up compliance inspection. They met with facility representatives, Mr. Tom Prots and John Van Der Noord. They observed and documented the installation of a new printing press prior to the permit modification request being completed. The new press was in place with all the control panels

we sent out new print files in June 2019

Civil Penalty Assessment Briefing Sheet - Fast Track Cases

Case #: 2019-056 Violator Reliance Packaging RO Contact FRO

Description of Violator

Type of Firm: Individual Company Contractor Other _____

Process/Products: SM class facility- violations of 2D .0611 and General Condition B.6

Description of Violation

Discovery Date: 23/01/2019 - Discovered by: Report Inspection Complaint

Nature of violation:

Reliance Packaging is an offset printing operation located in Aberdeen, Moore County. The facility produces various plastic bag products for items such as gardening mulch.

On 17 August 2018, Reliance Packaging was issued Air Quality Permit 10586R00, with an expiration date of 31 July 2026. This permit contains the following conditions:

General Condition B.6, requires that "...In accordance with G.S. 143-215.108(c)(1), the facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air cleaning device(s) and appurtenances."

Specific Condition and Limitation A.8: 15A NCAC 02D .0611 – Thermal Oxidizer Requirements requires that: A) "...VOC, HAP, and TAP emissions shall be controlled as described in the permitted equipment list." The permitted equipment list states that emissions from the 8 Color Flexographic Printing Press PCMC 7991 (Source ID No. ES-1) and 6 Color Flexographic Printing Press Schiavi//Padane Sirio 146 (Source ID No. ES-2) are controlled by the Natural Gas-fired Regenerative Thermal Oxidizer (RTO), and B) the Permittee shall: 1) maintain the temperature in the regenerative thermal oxidizer (RTO) at a minimum of 1,500 degrees Fahrenheit, based on a 3-hour rolling average; 2) continuously monitor and record the temperature in the thermal oxidizer while it is operating; and 3) maintain records on-site and in a form that is readily available for expeditious inspection and review.

Σ
Reliance Packaging
Of Sigma Plastics Group

RECEIVED

APR - 9 2019

DEQ-FAYETTEVILLE REGIONAL OFFICE

April 4, 2019

Ms. Heather Carter
Regional Supervisor – Fayetteville Regional Office
NCDEQ, Division of Air Quality
225 Green Street, Suite 714
Fayetteville, NC 28301-5094

Subject: Compliance Additional Information Request
Reliance Packaging, Permit No: 10586/R00
Aberdeen, NC Moore County, Facility ID: 6300110

Dear Ms. Carter:

We received your letter dated March 22nd requesting additional information relating to Reliance Packaging's air permit and related records. Pursuant to your letter (attached as Attachment 1), Reliance Packaging (Reliance) is responding and providing you with the following information and data:

1. Reliance commenced operations at 175 Anderson Street in January 2018. We extrude polyethylene film at 155 Anderson Street and previously had limited print capabilities with water-based inks (please see attached specification sheet and SDS in Attachment 2); however, printing was discontinued and the in-line press retired due to a number of factors, including print quality.
2. We operate the Schiavi press 6 to 7 days per week, 24 hours per day. The PCMC press only ran trials as it required extensive renovations to update its operating system from window's 95 NT that was finally completed in 2019.
3. Please see attached photo of the RTO display that shows the temperature of the chamber over 1,500 degrees (Attachment 3). Unfortunately, the temperature data recorder needed to be replaced which has now been completed.

The CMM RTO and presses have an interlock system that will not allow them to operate if the temperature is below a certain setpoint. This low temperature setpoint is typically lower than the minimum 3-hour chamber temperature to allow for fluctuations in VOC loading as the contributing process cycles through printing and non-printing operations.

Although the temperature was not recorded, the presence of the working interlock was completed and implemented in the beginning of September 2018. The presence of the working interlock on the combined press-RTO system, and the absence of operational issues maintaining the operating condition of the RTO during the period of September 2018 through February 2019 is evidence that the RTO was operating and controlling emissions.

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4. The spreadsheet printout attached in Attachment 4 shows the rolled up monthly ink/varnish and solvent use at the facility. This data was compiled based on facility purchases and ink inventory reconciliation.

5. The spreadsheet printout attached in Attachment 4 also shows VOCs released from the process, and the corresponding VOC emissions. The calculations assume 98% capture and 95% control starting in September 2018. If this is not acceptable to NCDEQ, please let us know, and we will re-calculate the emissions.

Reliance is primarily an extrusion company and appreciate your guidance to help us maintain the correct air quality compliance records, as required by our permit. In addition, Reliance has engaged the environmental consulting services of Compliance Management International (CMI) to further assist Reliance in its overall environmental compliance efforts.

If you have any questions regarding this request, please contact me using my contact information below, or our recently engaged environmental consultant Chris Maye of CMI at 215-699-4800x112 or cell at 215-692-3385.

Sincerely,



Satish Sharma
Reliance Packaging
155 Anderson Street
Aberdeen, NC 28315

Enclosures:

- ATTACHMENT 1 – March 22, 2019 NCDEQ Letter to Reliance
- ATTACHMENT 2 – Water-based Flexographic Ink SDS (Toyo)
- ATTACHMENT 3 – RTO Operation Evidence (photo of panel)
- ATTACHMENT 4 – Ink and Solvent Usage and Emission Data

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ATTACHMENT 1

March 22, 2019 NCDEQ Letter to Reliance

ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL A. ABRACZINSKAS
Director



NORTH CAROLINA
Environmental Quality

22 March 2019

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Satish Sharma, President
Reliance Packaging
175 Anderson Street
Aberdeen, NC 28315

SUBJECT: Compliance Additional Information Request
Reliance Packaging Permit No. 10586/R00
Aberdeen, NC, Moore County Facility ID: 6300110
Fee Class: Synthetic Minor

Dear Mr. Sharma:

On 13 March 2019, Stephen Allen and Abdul Kadir, both with the Fayetteville Regional Office of the Division of Air Quality (FRO DAQ), met with Tom Prottis, General Manager, and John Vandernoord, Maintenance Manager, to conduct a full air quality compliance inspection of Reliance Packaging, in Aberdeen, Moore County, NC. During this inspection, Mr. Prottis and Mr. Vandernoord were unable to provide any documentation that the temperature in the regenerative thermal oxidizer (ID No. CD1) had been maintained according to your current air permit Specific Condition and Limitation A.8, 15A NCAC 02D .0611 "Thermal Oxidizer Requirements," while the printing presses (ID Nos. ES-1 and ES-2) were operating. Therefore, additional information is needed to determine your compliance status with respect to your current air quality permit.

Please submit the following information to this office as soon as possible, but no later than 5 April 2019:

- 1) The printing operations start date on this site, including printing operations in other buildings,
- 2) Hours of printing press operation by month from January 2018 through February 2019,
- 3) Any documentation of regenerative thermal oxidizer operation at the minimum 3-hr average operating temperature of 1500°F (815°C) while printing presses were operating from January 2018 through February 2019,
- 4) Monthly product (ink, coating, solvent, etc) usage from January 2018 through February 2019,
- 5) Monthly and 12-month rolling total VOC emissions from January 2018 through February 2019.



North Carolina Department of Environmental Quality | Division of Air Quality
Fayetteville Regional Office | 225 Green Street, Suite 714 | Fayetteville, North Carolina 28301-5094
910.433.3300 T | 910.485.7467 F



Densiflex™ Series

Water-Based Surface Film Ink

Overview

Densiflex is a water-based surface printing ink for both two-roll and enclosed doctor-bladed presses. The Densiflex series has exhibited excellent printability on treated films like LDPE, HDPE and polypropylene substrates. The Densiflex system was developed to be used in heavy-duty applications where non-skid properties are required. Developed in 1995 it is a proven ink system with a proven track record.

Physical Characteristics

Densiflex inks are formulated to be low V.O.C. They have a maximum pigment load while maintaining a low consistent viscosity. The Densiflex system has excellent resolubility, allowing cleaner running of fine type and screen applications. Densiflex is compatible with highperformance cross-linker between 1-2% for maximum properties. It is available in bleed resistant, fade resistant and high-performance pigments for outdoor lightfast products.

Colors Available

Color computer-controlled bases computer matched to our competitors are available for customers with dispensers already in place, to avoid changing the database. We can ship DE specifications to meet the most stringent customer demands. Densiflex inks are compliant with safety, health and environmental regulations. They also conform to CONEG regulations when using barium-free formulations. Pantone® approved bases and mixes are available from several locations.

Attributes



Green — Eco-Friendly Environmentally friendly printing inks

Safety Data Sheet

Issue Date 2019/01/19
Version 1

1 IDENTIFICATION

Product code DF-DENSIFLEX WATER-BASED INKS
Identification of the product DF-DENSIFLEX WATER-BASED INKS
Reference number AGHSENA0107085 - 1
Recommended uses and restrictions on use Ink
Supplier TOYO INK AMERICA, LLC
 1225 N. Michael Drive, Wood Dale, IL 60191 U.S.A
 TEL: +1-630-930-5100
 FAX: +1-630-628-1769
Emergency Telephone Number 800-424-9300 (Chemtrec, 24/7 call center support), Acct.CCN22523 (TOYO INK AMERICA, LLC)

2 HAZARDS IDENTIFICATION

Classification
Health hazards
 Not classified
Physical and chemical hazards
 Not classified
GHS Label elements, including precautionary statements
 Not classified

Emergency Overview

Signal Word	None				
Hazard Statements	No hazard statement				
Color	No information available	Physical State	Liquid	Odor	Ammoniacal

Precautionary Statements
 None

OTHER INFORMATION
 Hazards not otherwise classified (HNOC)
 No information available
Other hazards
 Toxic to aquatic life

3. COMPOSITION/INFORMATION ON INGREDIENTS

Substance/mixture Mixture

Chemical Name	Weight	CAS No.
Water	50 - 60%	7732-18-5
Ammonia salt of modified styrene acrylic polymers	10 - 20%	Trade Secret
Ammonium salt of modified acrylic copolymers	3 - 5%	-
Pigment	1 - 3%	-
Acrylic Resin Solution	1 - 3%	323585-41-7
Other	9 - 35%	-

The exact percentage (concentration) and/or the specific chemical identity of composition has been withheld as a trade secret.

4. FIRST AID MEASURESDescription of necessary first-aid measures

Eye contact Rinse immediately with plenty of water, also under the eyelids, for at least 15 minutes
Get medical attention immediately

Skin contact Remove as much as possible by wiping
Wash off immediately with soap and plenty of water
Get medical attention immediately if symptoms occur

Inhalation Move victim to fresh air
Get medical attention immediately if symptoms occur

Ingestion Get medical attention immediately

Most important symptoms/effects, acute and delayed

Anticipated acute and delayed effects No information available

Most Important Symptoms/Effects No information available

Indication of immediate medical attention and special treatment needed, if necessary

Notes to physician Treat symptomatically

5. FIRE FIGHTING MEASURESSuitable/unsuitable extinguishing media

Extinguishing media Carbon dioxide (CO₂), Foam, Dry powder

Extinguishing Media Which Must Not Be Used For Safety Reasons Water jet

Specific hazards arising from the chemical See section 10 (Hazardous decomposition products)

Specific methods Promptly remove flammables (wood, paper, oil, clothes, etc.) that may be ignited

from around the fire site.
Cool the closed container exposed to high temperature with water spray.

Special protective equipment for fire-fighters Wear personal protective equipment
Evacuate area and fight fire from a safe distance

6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures

Personal precautions, protective equipment, and emergency procedures Wear suitable protective clothing
Evacuate personnel to safe areas

Secondary disaster prevention measures Remove all sources of ignition

Environmental precautions Dike to collect large liquid spills
Keep out of drains, sewers, ditches and waterways

Recovery and neutralization Take up with sand, earth or other non-combustible absorbent material
A lot of leakage things have the flow first stopped by earth and sand etc., and need to be led to a safe place.
Keep in suitable, closed containers for disposal
Use only non-sparking tools

7. HANDLING AND STORAGE

Handling

Technical measures Ensure adequate ventilation

Advice on safe handling Wash hands before breaks and immediately after handling the product
Do not eat, drink or smoke when using this product

Hygiene measures Handle in accordance with good industrial hygiene and safety practice

Storage

Technical measures/Storage conditions Protect from direct sunlight
Keep container tightly closed in a dry and well-ventilated place

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Exposure Guidelines No information available

Engineering measures Ensure adequate ventilation

Personal protective equipment

Eye protection Safety glasses with side-shields

Hand protection Protective gloves

Skin and body protection Long sleeved clothing Chemical resistant apron Antistatic boots

Respiratory protection In case of insufficient ventilation, wear suitable respiratory equipment

9. PHYSICAL AND CHEMICAL PROPERTIES

Information on basic physical and chemical properties

Physical State	Liquid	Color	No information available
Odor	Ammoniacal	Odor Threshold	No information available

Property	
pH VALUE	-
Melting point/range	No information available
Boiling Point/Range	No information available
Flash point	Not flammable 104.4444 °C -
Evaporation rate	No information available
Flammability (solid, gas)	No information available
Upper/lower flammability or explosive limits	No information available
Vapor pressure	No information available
Vapor density	No information available
Specific Gravity	approx. 1.1 - 1.2
Water solubility	Soluble
Solubility in other solvents	No information available
Partition Coefficient (n-octanol/water)	No information available
Autoignition temperature	No information available
Decomposition temperature	No information available
Viscosity	No information available
VOC Content (%)	Estimated 1

10. STABILITY AND REACTIVITY

Stability / Hazardous Reactions

Stability Stable under normal conditions
Stable at normal handling

Possibility of hazardous reactions No information available

Conditions to avoid High temperature and freeze

Materials to avoid No information available

Hazardous decomposition products No information available

11. TOXICOLOGICAL INFORMATION

Information on likely routes of exposure See Section 4

Acute toxicity No acute toxicity information is available for this product

Carcinogenicity No Information available as a product

12. ECOLOGICAL INFORMATION

Environmental hazards There is no known ecological information for this product

Persistence and degradability No information available

Bioaccumulative potential No information available

13. DISPOSAL CONSIDERATIONS

Waste from residues/unused products To discard the container after using up the contents
Dispose of in accordance with federal, state and local regulations

Contaminated packaging Empty containers should be recycling or disposal in accordance with the law

14. TRANSPORT INFORMATION

ADR/RID ICAO/IATA IMDG/IMO

UN number Not applicable

UN Proper shipping name Not applicable

UN Classification Not applicable

Packaging group Not applicable

Marine pollutant No

Emergency Response Guide Number Not applicable

Special safety measures Ground and bond containers when transferring material

15. REGULATORY INFORMATION

Domestic Regulations

U.S. Federal Regulations

TSCA Section 5(a)(2) SNURs

Chemical Name	TSCA Section 5(a)(2) Chemicals with SNURs
5-Chloro-2-methyl-3-isothiazolone	62 FR 34421, Jun 26, 1997 proposed rule PMN P-95-0116 721.04525 62 FR 34421, Jun 26, 1997 proposed rule PMN P-96-1250 721.04525
2-Methyl-3-isothiazolone	40 CFR 721.4525 proposed rule PMN P-96-0117 721.04525 40 CFR 721.4525 proposed rule PMN P-96-1251 721.04525
Siloxane	X
Acrylic polymer	X

SARA 313
Not applicable

SARA 311/312 Hazard Categories

Acute Health Hazard No

Chronic Health Hazard No

Fire Hazard No

Sudden Release of Pressure Hazard No
Reactive Hazard No

Clean Air Act

Chemical Name	CAA 1990 Hazardous Air Pollutants
Ethylbenzene	Listed
Styrene	Listed
Diethylene glycol monoethyl ether	Listed
Acrylic acid	Listed

CERCLA

Chemical Name	CERCLA/SARA Hazardous Substances RQs
Ethylbenzene	1000 lb
Styrene	1000 lb
Cyclohexane	1000 lb
Sodium hydroxide	1000 lb
Ammonium hydroxide	1000 lb
Copper	5000 lb
Acrylic acid	5000 lb

U.S. State Regulations

California Proposition 65

Chemical Name	CA Prop 65 Carcinogens	CA Prop 65 Developmental	CA Prop 65 Reproductive Male	CA Prop 65 Reproductive Female
Ethylbenzene	Listed	-	-	-
Styrene	Listed	-	-	-
C.I. Pigment Orange 5	Listed	-	-	-
Pigment Red 53:1	Listed	-	-	-

U.S. State Right-to-Know Regulations

Chemical Name	New Jersey	New Jersey Special Health Hazards Substances List	Pennsylvania	Massachusetts
Carbon black	Listed	>=0.1%	Listed	Listed
Ammonium hydroxide	-	-	Environmental hazard	-
Titanium dioxide	Listed	-	Listed	Listed
Isopropyl alcohol	-	-	Environmental hazard	-
Copper	-	-	Environmental hazard	-

International Regulations

Basel Convention - Hazardous Wastes
 Not Listed

Montreal Protocol - Ozone Depleting Substances
 Not Listed

Stockholm Convention - Persistent Organic Pollutants (POPs)

Not Listed

Rotterdam Convention - Chemicals Subject to Prior Informed Consent (PIC)

Not Listed

A civil law except the above and foreign legal regulation

U.S. TSCA: All ingredients in this product are listed on the Toxic Substances Control Act (TSCA) Inventory.

16 OTHER INFORMATION, INCLUDING DATE OF PREPARATION OF THE LAST REVISION

<u>NFPA</u>	NFPA Health Hazard	-	NFPA Flammability	-	NFPA Instability	-	NFPA Special Hazard
<u>HMIS</u>	HMIS Health	-	HMIS Flammability	-	HMIS Physical Hazard	-	HMIS Personal Protection

Legend

Section 8: EXPOSURE CONTROLS/PERSONAL PROTECTION

TWA:	Time weighted average	STEL:	Short term exposure limit
Ceiling:	Maximum limit value	IDLH:	Immediately Dangerous to Life or Health
S*:	Skin absorption	S+:	Sensitizer

Manufacturer Same as Supplier

Literary reference ACGIH (American Conference of Governmental Industrial Hygienists)
 IARC (International Agency for Research on Cancer)
 Classification according to Regulation (EC) No. 1272/2008 [CLP]
 NIOSH (National Institute for Occupational Safety and Health)
 NTP (National Toxicology Program)
 OSHA (Occupational Safety and Health Administration of the US Department of Labor)

Issue Date 2019/01/19

Revision Date -

Version 1

- The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text

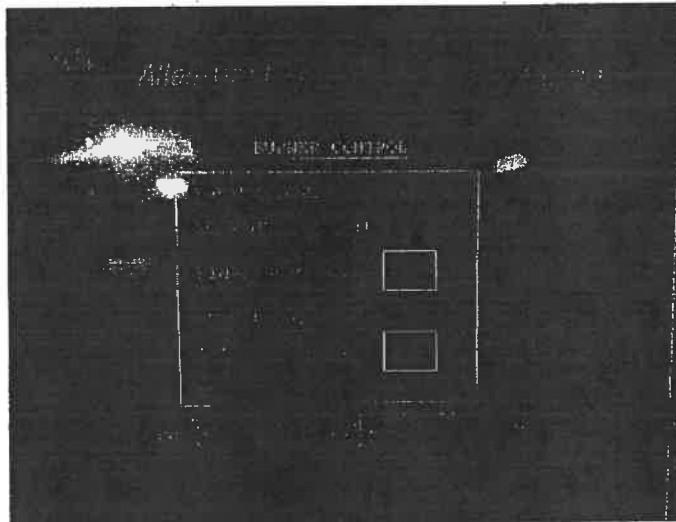
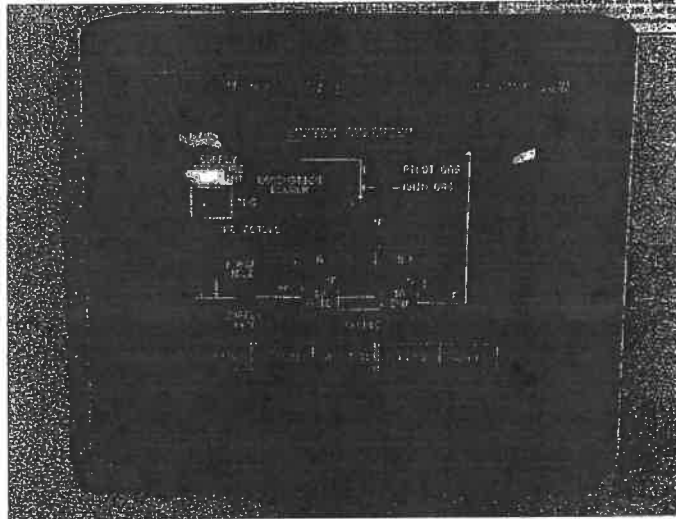
End of Safety Data Sheet

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ATTACHMENT 3

RTO Operation Evidence (photo of panel)

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ATTACHMENT 4

Solvent and Ink Usage-Emissions Records/Calculations

Reliance Packaging

Press Ink & Solvent Use + Emissions

Inv Adjusted = (% Change in inventory over calendar year) * Use

YEAR	MON	Solvent (lbs)		Inventory (lbs)			VOC EMISSIONS			
		Use	VOC	Use	Adjusted	VOC	Capture	Control	Emissions	Emissions
2018	Jan	6,768	6,768	16,520	16,520	5,431	0%	0%	5,431	
2018	Feb	11,280	11,280	4,241	3,331	1,620	0%	0%	1,620	
2018	Mar	15,792	15,792	16,009	14,932	7,397	0%	0%	7,397	
2018	Apr	13,536	13,536	18,539	14,562	7,263	0%	0%	7,263	
2018	May	13,536	13,536	19,259	9,829	4,700	0%	0%	4,700	
2018	Jun	9,024	9,024	11,660	9,159	4,673	0%	0%	4,673	
2018	Jul	5,311	5,311	8,992	7,663	3,537	0%	0%	3,537	
2018	Aug	13,536	13,536	12,823	10,673	4,943	0%	0%	4,943	
2018	Sep	2,256	2,256	11,693	9,139	4,499	0%	0%	4,499	
2018	Oct	4,512	4,512	20,263	15,917	7,839	0%	0%	7,839	
2018	Nov	13,536	13,536	16,531	13,001	6,330	0%	0%	6,330	
2018	Dec	13,968	13,968	16,679	13,101	6,512	0%	0%	6,512	
2019	Jan	9,456	9,456	16,701	23,956	17,957	0%	0%	17,957	
2019	Feb	16,200	16,200	21,450	33,864	16,412	0%	0%	16,412	

1745 tons

Reliance-InkSolvent-Usage-Emissions.xlsx

YR-MO	Item Number	Item Description	LBS	VOC Contn	LBS VOC	Start of Year Ink Inventory	35659	lbs	End of Year Ink Inventory	13,580	lbs	(FEBRUARY UPDATE)
						% adjustment		58%				
2019-01	01-1068-DRUM	SOIL WHITE LO SLIP	8,640	44.2%	3819							
2019-01	01-1283-DRUM	SOIL BLACK HI STR LO SLIP	3,040	54.4%	1654							
2019-01	04-01-0945-DRUM	WEATHER-MASTER XT 102 YELLOW LF	730	54.4%	397							
2019-01	04-01-0951-DRUM	WEATHER-MASTER XT 476 BROWN LF	2,260	54.4%	1229							
2019-01	04-01-0952-DRUM	WEATHER-MASTER XT 187 RED LF	380	54.4%	207							
2019-01	04-01-0970-DRUM	WEATHER-MASTER XT 355 GREEN LF	350	54.4%	190							
2019-01	04-01-1010-DRUM	WEATHER-MASTER XT 172 ORANGE LF	380	54.4%	207							
2019-01	04-01-1420-DRUM	WEATHERMASTER XT 335 GREEN LF	350	54.4%	190							
2019-01	04-01-1484-PAIL	WEATHERMASTER XT 173 RED LF	111	54.4%	60							
2019-01	04-01-1526-PAIL	WEATHERMASTER XT 807 PURPLE LF	72	54.4%	39							
2019-01	04-01-1527-PAIL	WEATHERMASTER XT 513 PURPLE LF	108	54.4%	59							
2019-01	04-01-1777-PAIL	WEATHERMASTER XT 428 GRAY LF	140	54.4%	76							
2019-01	04-01-1778-PAIL	WEATHERMASTER XT 249 PURPLE LF	140	54.4%	76							
Total 2019-01			16,701		8,204							
2019-02	01-1068-DRUM	SOIL WHITE LO SLIP	12,480	44.2%	5516							
2019-02	01-1283-DRUM	SOIL BLACK HI STR LO SLIP	2,280	54.4%	1240							
2019-02	04-01-0061-PAIL	WEATHER-MASTER XT CYAN BLUE LF	108	54.4%	59							
2019-02	04-01-0904-DRUM	WEATHER-MASTER XT 1505 ORANGE LF	350	54.4%	190							
2019-02	04-01-0906-DRUM	WEATHER-MASTER XT 285 BLUE LF	350	54.4%	190							
2019-02	04-01-0909-DRUM	WEATHER-MASTER XT 469 BROWN LF	1,050	54.4%	571							
2019-02	04-01-0919-DRUM	WEATHER-MASTER XT 485 RED LF	350	54.4%	190							
2019-02	04-01-0943-DRUM	WEATHER-MASTER XT 201 RED LF	350	54.4%	190							
2019-02	04-01-0945-DRUM	WEATHER-MASTER XT 102 YELLOW LF	700	54.4%	381							
2019-02	04-01-0951-DRUM	WEATHER-MASTER XT 476 BROWN LF	350	54.4%	190							
2019-02	04-01-0953-DRUM	WEATHER-MASTER XT 108 YELLOW LF	350	54.4%	190							
2019-02	04-01-0963-DRUM	WEATHER-MASTER XT REFLEX BLUE LF	700	54.4%	381							
2019-02	04-01-0970-DRUM	WEATHER-MASTER XT 355 GREEN LF	350	54.4%	190							
2019-02	04-01-0994-DRUM	WEATHER-MASTER XT LINE PROC MAGENTA	350	54.4%	190							
2019-02	04-01-1144-DRUM	WEATHER-MASTER XT 348 GREEN LF	370	54.4%	201							
2019-02	04-01-1164-PAIL	WEATHER-MASTER XT 139 TAN LF	105	54.4%	57							
2019-02	04-01-1193-PAIL	WEATHER-MASTER XT 511 PURPLE LF	70	54.4%	38							
2019-02	04-01-1363-PAIL	WEATHERMASTER XT 7627 RED LF	144	54.4%	78							
2019-02	04-01-1377-PAIL	WEATHERMASTER XT 357 GREEN LF	72	54.4%	39							
2019-02	04-01-1407-PAIL	WEATHERMASTER XT 470 BROWN LF	70	54.4%	38							
2019-02	04-01-1525-PAIL	WEATHERMASTER XT 1235 YELLOW LF	108	54.4%	59							
2019-02	04-01-1529-PAIL	WEATHERMASTER XT 2718 BLUE LF	36	54.4%	20							
2019-02	04-01-1607-PAIL	WEATHERMASTER XT SUNSCAPES PM PINK	72	54.4%	39							
2019-02	04-01-1609-PAIL	WEATHERMASTER XT SUNSCAPES DFR GRAY	36	54.4%	20							
2019-02	04-01-1610-PAIL	WEATHERMASTER XT SUNSCAPES MMC BLU	72	54.4%	39							
2019-02	04-01-1747-PAIL	WEATHERMASTER XT 224 PINK LF	72	54.4%	39							
2019-02	04-01-1792-PAIL	WEATHERMASTER XT 7566 BROWN LF	105	54.4%	57							
Total 2019-02			21,450		10,396							

Reliance-InkSolvent-Usage-Emissions.xlsx

Yr/Mon	Item Number	Item Description	LBS	VOC Content	LBS VOC	Start of Year Ink Inventory	0 lbs
						End of Year Ink Inventory	35,659 lbs
						% adjustment	-21%
2018 01	01-1068-DRUM	SOIL WHITE LO SLIP	4,320	44.2%	1909		
2018 01	01-1283-DRUM	SOIL BLACK HI STR LO SLIP	3,040	54.4%	1654		
2018 01	04-01-0909-DRUM	WEATHER-MASTER XT 469 BROWN LF	700	54.4%	381		
2018 01	04-01-0919-DRUM	WEATHER-MASTER XT 485 RED LF	350	54.4%	190		
2018 01	04-01-0943-DRUM	WEATHER-MASTER XT 201 RED LF	350	54.4%	190		
2018 01	04-01-0945-DRUM	WEATHER-MASTER XT 102 YELLOW LF	700	54.4%	381		
2018 01	04-01-0951-DRUM	WEATHER-MASTER XT 476 BROWN LF	1,400	54.4%	762		
2018 01	04-01-0953-DRUM	WEATHER-MASTER XT 108 YELLOW LF	350	54.4%	190		
2018 01	04-01-1338-PAIL	WEATHERMASTER XT 362 GREEN LF	105	54.4%	57		
2018 01	04-01-1377-PAIL	WEATHERMASTER XT 357 GREEN LF	105	54.4%	57		
2018 01	04-01-1392-PAIL	WEATHERMASTER XT 7566 ORANGE LF	140	54.4%	76		
2018 01	04-01-1428-PAIL	WEATHERMASTER XT 342 GREEN LF	140	54.4%	76		
2018 01	04-01-1503-PAIL	WEATHERMASTER XT 479 TAN LF	70	54.4%	38		
2018 01	04-01-1530-DRUM	WEATHERMASTER XT 141 YELLOW LF	350	54.4%	190		
2018 01	04-01-1531-DRUM	WEATHERMASTER XT 126 BROWN LF	350	54.4%	190		
2018 01	04-01-1545-DRUM	WEATHERMASTER XT 329 GREEN LF	1,050	54.4%	571		
2018 01 Total			13,520		6,914		
2018 02	01-1068-DRUM	SOIL WHITE LO SLIP	2,400	44.2%	1061		
2018 02	04-01-0061-PAIL	WEATHER-MASTER XT CYAN BLUE LF	105	54.4%	57		
2018 02	04-01-0951-DRUM	WEATHER-MASTER XT 476 BROWN LF	746	54.4%	406		
2018 02	04-01-0963-PAIL	WEATHER-MASTER XT REFLEX BLUE LF	140	54.4%	76		
2018 02	04-01-1417-DRUM	WEATHERMASTER XT 7539 BROWN LF	350	54.4%	190		
2018 02	04-01-1428-DRUM	WEATHERMASTER XT 342 GREEN LF	360	54.4%	196		
2018 02	04-01-1525-PAIL	WEATHERMASTER XT 1235 YELLOW LF	140	54.4%	76		
2018 02 Total			4,241		2,082		
2018 03	01-1068-DRUM	SOIL WHITE LO SLIP	9,120	44.2%	4031		
2018 03	01-1283-DRUM	SOIL BLACK HI STR LO SLIP	3,040	54.4%	1654		
2018 03	04-01-0943-DRUM	WEATHER-MASTER XT 201 RED LF	360	54.4%	196		
2018 03	04-01-0945-DRUM	WEATHER-MASTER XT 102 YELLOW LF	370	54.4%	201		
2018 03	04-01-0951-DRUM	WEATHER-MASTER XT 476 BROWN LF	2,510	54.4%	1365		
2018 03	04-01-0953-DRUM	WEATHER-MASTER XT 108 YELLOW LF	370	54.4%	201		
2018 03	04-01-0963-PAIL	WEATHER-MASTER XT REFLEX BLUE LF	144	54.4%	78		
2018 03	04-01-0970-DRUM	WEATHER-MASTER XT 355 GREEN LF	350	54.4%	190		
2018 03	04-01-1249-PAIL	WEATHERMASTER XT CYPRESS BLUE	70	54.4%	38		
2018 03	04-01-1263-PAIL	WEATHER-MASTER XT 264 VIOLET LF	70	54.4%	38		
2018 03	04-01-1265-PAIL	WEATHER-MASTER XT 608 YELLOW LF	105	54.4%	57		
2018 03	04-01-1390-PAIL	WEATHERMASTER XT WARM GRAY 7C LF	175	54.4%	95		
2018 03	04-01-1530-DRUM	WEATHERMASTER XT 141 YELLOW LF	700	54.4%	381		
2018 03	04-01-1531-DRUM	WEATHERMASTER XT 126 BROWN LF	350	54.4%	190		
2018 03	04-01-1545-DRUM	WEATHERMASTER XT 329 GREEN LF	1,100	54.4%	598		
2018 03	04-01-1621-PAIL	WEATHERMASTER XT 1935 RED LF	175	54.4%	95		
2018 03 Total			19,009		9,411		
2018 04	01-1068-DRUM	SOIL WHITE LO SLIP	8,160	44.2%	3607		
2018 04	01-1283-DRUM	SOIL BLACK HI STR LO SLIP	2,660	54.4%	1447		
2018 04	04-01-0061-PAIL	WEATHER-MASTER XT CYAN BLUE LF	140	54.4%	76		
2018 04	04-01-0945-DRUM	WEATHER-MASTER XT 102 YELLOW LF	350	54.4%	190		
2018 04	04-01-0951-DRUM	WEATHER-MASTER XT 476 BROWN LF	1,400	54.4%	762		
2018 04	04-01-0952-DRUM	WEATHER-MASTER XT 187 RED LF	1,400	54.4%	762		
2018 04	04-01-0953-DRUM	WEATHER-MASTER XT 108 YELLOW LF	700	54.4%	381		
2018 04	04-01-0953-DRUM	WEATHER-MASTER XT 108 YELLOW LF	350	54.4%	190		
2018 04	04-01-0994-DRUM	WEATHER-MASTER XT LINE PROC MAGENTA LF	175	54.4%	95		
2018 04	04-01-1010-PAIL	WEATHER-MASTER XT 172 ORANGE LF	140	54.4%	76		
2018 04	04-01-1357-PAIL	WEATHERMASTER XT 118 YELLOW LF	140	54.4%	76		
2018 04	04-01-1373-DRUM	WEATHERMASTER XT 4625 BROWN LF	360	54.4%	196		
2018 04	04-01-1377-PAIL	WEATHERMASTER XT 357 GREEN LF	140	54.4%	76		
2018 04	04-01-1382-PAIL	WEATHERMASTER XT 138 TAN LF	108	54.4%	59		
2018 04	04-01-1525-PAIL	WEATHERMASTER XT 1235 YELLOW LF	175	54.4%	95		
2018 04	04-01-1531-DRUM	WEATHERMASTER XT 126 BROWN LF	700	54.4%	381		
2018 04	04-01-1603-PAIL	WEATHERMASTER XT SUNSCAPES 5PM VIOLET LF	105	54.4%	57		
2018 04	04-01-1604-PAIL	WEATHERMASTER XT SUNSCAPES PB YELLOW LF	105	54.4%	57		
2018 04	04-01-1605-PAIL	WEATHERMASTER XT SUNSCAPE RLR RED LF	105	54.4%	57		
2018 04	04-01-1606-PAIL	WEATHERMASTER XT SUNSCAPES PS ORANGE LF	111	54.4%	60		
2018 04	04-01-1607-PAIL	WEATHERMASTER XT SUNSCAPES PM PINK LF	105	54.4%	57		
2018 04	04-01-1608-PAIL	WEATHERMASTER XT SUNSCAPES NSS GREEN LF	105	54.4%	57		
2018 04	04-01-1609-PAIL	WEATHERMASTER XT SUNSCAPES DFR GRAY LF	105	54.4%	57		
2018 04	04-01-1610-DRUM	WEATHERMASTER XT SUNSCAPES MMC BLUE LF	350	54.4%	190		
2018 04	04-01-1610-PAIL	WEATHERMASTER XT SUNSCAPES MMC BLUE LF	105	54.4%	57		
2018 04	04-01-1611-PAIL	WEATHERMASTER XT SUNSCAPES PG GREEN XT	105	54.4%	57		
2018 04	04-01-1631-PAIL	WEATHERMASTER XT 215 PINK LF	140	54.4%	76		
2018 04	04-01-1656-PAIL	WEATHERMASTER XT 345 GREEN LF	140	54.4%	76		
2018 04 Total			18,539		9,253		
2018 05	01-1068-DRUM	SOIL WHITE LO SLIP	6,720	44.2%	2970		
2018 05	01-1283-DRUM	SOIL BLACK HI STR LO SLIP	1,520	54.4%	827		
2018 05	04-01-0909-DRUM	WEATHER-MASTER XT 469 BROWN LF	360	54.4%	196		
2018 05	04-01-0919-DRUM	WEATHER-MASTER XT 485 RED LF	350	54.4%	190		
2018 05	04-01-0945-DRUM	WEATHER-MASTER XT 102 YELLOW LF	360	54.4%	196		
2018 05	04-01-0951-DRUM	WEATHER-MASTER XT 476 BROWN LF	1,060	54.4%	577		

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							Start of Year Ink Inventory	0 lbs
2018 05	04-01-0953-DRUM	WEATHER-MASTER XT 108 YELLOW LF	360	54.4%	196			
2018 05	04-01-0963-PAIL	WEATHER-MASTER XT REFLEX BLUE LF	140	54.4%	76			
2018 05	04-01-1010-DRUM	WEATHER-MASTER XT 172 ORANGE LF	380	54.4%	207			
2018 05	04-01-1109-PAIL	WEATHER-MASTER XT 482 TAN	140	54.4%	76			
2018 05	04-01-1428-PAIL	WEATHERMASTER XT 342 GREEN LF	134	54.4%	73			
2018 05	04-01-1603-PAIL	WEATHERMASTER XT SUNSCAPES SPM VIOLET LF	105	54.4%	57			
2018 05	04-01-1604-PAIL	WEATHERMASTER XT SUNSCAPES PB YELLOW LF	105	54.4%	57			
2018 05	04-01-1606-PAIL	WEATHERMASTER XT SUNSCAPES PS ORANGE LF	105	54.4%	57			
2018 05	04-01-1607-PAIL	WEATHERMASTER XT SUNSCAPES PM PINK LF	105	54.4%	57			
2018 05	04-01-1608-PAIL	WEATHERMASTER XT SUNSCAPES NSS GREEN LF	105	54.4%	57			
2018 05	04-01-1609-PAIL	WEATHERMASTER XT SUNSCAPES DFR GRAY LF	105	54.4%	57			
2018 05	04-01-1611-PAIL	WEATHERMASTER XT SUNSCAPES PG GREEN XT	105	54.4%	57			
2018 05 Total			12,259		5,983			
2018 06	01-1068-DRUM	SOIL WHITE LO SLIP	3,840	44.2%	1697			
2018 06	01-1283-DRUM	SOIL BLACK HI STR LO SLIP	1,900	54.4%	1034			
2018 06	04-01-0897-DRUM	WEATHER-MASTER XT 185 RED LF	370	54.4%	201			
2018 06	04-01-0945-DRUM	WEATHER-MASTER XT 102 YELLOW LF	1,480	54.4%	805			
2018 06	04-01-0951-DRUM	WEATHER-MASTER XT 476 BROWN LF	740	54.4%	403			
2018 06	04-01-0963-DRUM	WEATHER-MASTER XT REFLEX BLUE LF	740	54.4%	403			
2018 06	04-01-0970-DRUM	WEATHER-MASTER XT 355 GREEN LF	370	54.4%	201			
2018 06	04-01-1531-DRUM	WEATHERMASTER XT 126 BROWN LF	740	54.4%	403			
2018 06	04-01-1545-DRUM	WEATHERMASTER XT 329 GREEN LF	1,480	54.4%	805			
2018 06 Total			11,660		5,951			
2018 07	01-1068-DRUM	SOIL WHITE LO SLIP	3,840	44.2%	1697			
2018 07	01-1292-DRUM	SOIL NON-SKID LACQUER LO SLIP	648	54.4%	353			
2018 07	04-01-0951-DRUM	WEATHER-MASTER XT 476 BROWN LF	740	54.4%	403			
2018 07	04-01-0952-DRUM	WEATHER-MASTER XT 187 RED LF	740	54.4%	403			
2018 07	04-01-0953-DRUM	WEATHER-MASTER XT 108 YELLOW LF	370	54.4%	201			
2018 07	04-01-0970-DRUM	WEATHER-MASTER XT 355 GREEN LF	370	54.4%	201			
2018 07	04-01-1530-DRUM	WEATHERMASTER XT 141 YELLOW LF	740	54.4%	403			
2018 07	04-01-1531-DRUM	WEATHERMASTER XT 126 BROWN LF	1,480	54.4%	805			
2018 07	98-0054-PAIL	ARCOSOLVE PNP	70	54.4%	38			
2018 07 Total			8,998		4,503			
2018 08	01-1068-DRUM	SOIL WHITE LO SLIP	6,720	44.2%	2970			
2018 08	01-1283-DRUM	SOIL BLACK HI STR LO SLIP	1,900	54.4%	1034			
2018 08	01-2751-DRUM	SOIL NON-SKID OPV	770	54.4%	419			
2018 08	04-01-0951-DRUM	WEATHER-MASTER XT 476 BROWN LF	1,400	54.4%	762			
2018 08	04-01-0952-DRUM	WEATHER-MASTER XT 187 RED LF	370	54.4%	201			
2018 08	04-01-1264-PAIL	WEATHER-MASTER XT 506 BROWN LF	170	54.4%	92			
2018 08	04-01-1305-PAIL	WEATHERMASTER XT 100 YELLOW	108	54.4%	59			
2018 08	04-01-1306-PAIL	WEATHERMASTER XT 463 BROWN	144	54.4%	78			
2018 08	04-01-1307-PAIL	WEATHERMASTER XT 465 BROWN	144	54.4%	78			
2018 08	04-01-1380-DRUM	WEATHERMASTER XT PANTONE GREEN C LF	350	54.4%	190			
2018 08	04-01-1525-PAIL	WEATHERMASTER XT 1235 YELLOW LF	144	54.4%	78			
2018 08	04-01-1528-PAIL	WEATHERMASTER XT 322 BLUE LF	140	54.4%	76			
2018 08	04-01-1608-PAIL	WEATHERMASTER XT SUNSCAPES NSS GREEN LF	144	54.4%	78			
2018 08	04-01-1716-PAIL	WEATHERMASTER XT 368 GREEN LF	180	54.4%	98			
2018 08	04-01-1718-PAIL	WEATHERMASTER XT 1245 YELLOW LF	144	54.4%	78			
2018 08 Total			12,828		6,293			
2018 09	01-1068-DRUM	SOIL WHITE LO SLIP	6,240	44.2%	2758			
2018 09	01-1283-DRUM	SOIL BLACK HI STR LO SLIP	2,660	54.4%	1447			
2018 09	04-01-0951-DRUM	WEATHER-MASTER XT 476 BROWN LF	1,110	54.4%	604			
2018 09	04-01-0951-PAIL	WEATHER-MASTER XT 476 BROWN LF	114	54.4%	62			
2018 09	04-01-0952-DRUM	WEATHER-MASTER XT 187 RED LF	740	54.4%	403			
2018 09	04-01-0953-DRUM	WEATHER-MASTER XT 108 YELLOW LF	370	54.4%	201			
2018 09	04-01-1049-PAIL	WEATHER-MASTER XT 383 GREEN	140	54.4%	76			
2018 09	04-01-1503-PAIL	WEATHERMASTER XT 479 TAN LF	114	54.4%	62			
2018 09	04-01-1727-PAIL	WEATHERMASTER XT 269 VIOLET LF	70	54.4%	38			
2018 09	04-01-1728-PAIL	WEATHERMASTER XT 240 PINK LF	70	54.4%	38			
2018 09	04-01-1729-PAIL	WEATHERMASTER XT 334 GREEN LF	70	54.4%	38			
2018 09 Total			11,698		5,727			
2018 10	01-1068-DRUM	SOIL WHITE LO SLIP	9,600	44.2%	4243			
2018 10	01-1283-DRUM	SOIL BLACK HI STR LO SLIP	2,280	54.4%	1240			
2018 10	04-01-0897-DRUM	WEATHER-MASTER XT 185 RED LF	380	54.4%	207			
2018 10	04-01-0904-DRUM	WEATHER-MASTER XT 1505 ORANGE LF	350	54.4%	190			
2018 10	04-01-0909-DRUM	WEATHER-MASTER XT 469 BROWN LF	350	54.4%	190			
2018 10	04-01-0918-PAIL	WEATHER-MASTER XT 021 ORANGE LF	140	54.4%	76			
2018 10	04-01-0919-DRUM	WEATHER-MASTER XT 485 RED LF	350	54.4%	190			
2018 10	04-01-0943-DRUM	WEATHER-MASTER XT 201 RED LF	730	54.4%	397			
2018 10	04-01-0945-DRUM	WEATHER-MASTER XT 102 YELLOW LF	350	54.4%	190			
2018 10	04-01-0951-DRUM	WEATHER-MASTER XT 476 BROWN LF	1,400	54.4%	762			
2018 10	04-01-0952-DRUM	WEATHER-MASTER XT 187 RED LF	360	54.4%	196			
2018 10	04-01-0953-DRUM	WEATHER-MASTER XT 108 YELLOW LF	720	54.4%	392			
2018 10	04-01-0963-DRUM	WEATHER-MASTER XT REFLEX BLUE LF	730	54.4%	397			
2018 10	04-01-1264-PAIL	WEATHER-MASTER XT 506 BROWN LF	140	54.4%	76			
2018 10	04-01-1265-PAIL	WEATHER-MASTER XT 608 YELLOW LF	108	54.4%	59			
2018 10	04-01-1305-PAIL	WEATHERMASTER XT 100 YELLOW	108	54.4%	59			
2018 10	04-01-1306-PAIL	WEATHERMASTER XT 463 BROWN	144	54.4%	78			

Reliance-InkSolvent-Usage-Emissions.xlsx

					Start of Year Ink Inventory	0 lbs
2018 10	04-01-1307-PAIL	WEATHERMASTER XT 465 BROWN	144	54.4%	78	
2018 10	04-01-1357-PAIL	WEATHERMASTER XT 118 YELLOW LF	210	54.4%	114	
2018 10	04-01-1427-PAIL	WEATHERMASTER XT 3005 BLUE LF	140	54.4%	76	
2018 10	04-01-1512-PAIL	WEATHERMASTER XT 486 RED LF	292	54.4%	159	
2018 10	04-01-1525-PAIL	WEATHERMASTER XT 1235 YELLOW LF	251	54.4%	137	
2018 10	04-01-1527-PAIL	WEATHERMASTER XT 513 PURPLE LF	140	54.4%	76	
2018 10	04-01-1605-PAIL	WEATHERMASTER XT SUNSCAPE RLR RED LF	148	54.4%	81	
2018 10	04-01-1656-PAIL	WEATHERMASTER XT 345 GREEN LF	140	54.4%	76	
2018 10	04-01-1718-PAIL	WEATHERMASTER XT 1245 YELLOW LF	140	54.4%	76	
2018 10	04-01-1738-PAIL	WEATHERMASTER XT 4695 BROWN LF	68	54.4%	37	
2018 10	04-01-1742-DRUM	WEATHERMASTER XT 359 GREEN LF	350	54.4%	190	
2018 10 Total			20,263		10,044	
2018 11	01-1068-DRUM	SOIL WHITE LO SLIP	8,640	44.2%	3819	
2018 11	01-1283-DRUM	SOIL BLACK HI STR LO SLIP	1,140	54.4%	620	
2018 11	04-01-0909-DRUM	WEATHER-MASTER XT 469 BROWN LF	740	54.4%	403	
2018 11	04-01-0918-PAIL	WEATHER-MASTER XT 021 ORANGE LF	148	54.4%	81	
2018 11	04-01-0951-DRUM	WEATHER-MASTER XT 476 BROWN LF	1,480	54.4%	805	
2018 11	04-01-0953-DRUM	WEATHER-MASTER XT 108 YELLOW LF	370	54.4%	201	
2018 11	04-01-0994-DRUM	WEATHER-MASTER XT LINE PROC MAGENTA LF	370	54.4%	201	
2018 11	04-01-1010-DRUM	WEATHER-MASTER XT 172 ORANGE LF	350	54.4%	190	
2018 11	04-01-1049-PAIL	WEATHER-MASTER XT 583 GREEN	148	54.4%	81	
2018 11	04-01-1109-PAIL	WEATHER-MASTER XT 482 TAN	148	54.4%	81	
2018 11	04-01-1163-PAIL	WEATHERMASTER XT 349 GREEN LF	148	54.4%	81	
2018 11	04-01-1257-DRUM	WEATHER-MASTER XT 376 GREEN LF	380	54.4%	207	
2018 11	04-01-1406-PAIL	WEATHERMASTER XT 188 RED LF	111	54.4%	60	
2018 11	04-01-1418-PAIL	WEATHERMASTER XT 5185 PURPLE LF	74	54.4%	40	
2018 11	04-01-1428-PAIL	WEATHERMASTER XT 342 GREEN LF	140	54.4%	76	
2018 11	04-01-1484-PAIL	WEATHERMASTER XT 173 RED LF	82	54.4%	45	
2018 11	04-01-1545-DRUM	WEATHERMASTER XT 329 GREEN LF	1,400	54.4%	762	
2018 11	04-01-1716-PAIL	WEATHERMASTER XT 368 GREEN LF	148	54.4%	81	
2018 11	04-01-1718-PAIL	WEATHERMASTER XT 1245 YELLOW LF	140	54.4%	76	
2018 11	04-01-1747-PAIL	WEATHERMASTER XT 224 PINK LF	180	54.4%	98	
2018 11	04-01-1748-PAIL	WEATHERMASTER XT 228 RED LF	70	54.4%	38	
2018 11	04-01-1749-PAIL	WEATHERMASTER XT 107 YELLOW LF	70	54.4%	38	
2018 11	04-01-1750-PAIL	WEATHERMASTER XT 504 BURGANDY LF	74	54.4%	40	
2018 11 Total			16,551		8,122	
2018 12	01-1068-DRUM	SOIL WHITE LO SLIP	7,680	44.2%	3395	
2018 12	01-1283-DRUM	SOIL BLACK HI STR LO SLIP	2,280	54.4%	1240	
2018 12	01-2751-DRUM	SOIL NON-SKID OPV	1,540	54.4%	838	
2018 12	04-01-0909-DRUM	WEATHER-MASTER XT 469 BROWN LF	700	54.4%	381	
2018 12	04-01-0918-PAIL	WEATHER-MASTER XT 021 ORANGE LF	74	54.4%	40	
2018 12	04-01-0943-DRUM	WEATHER-MASTER XT 201 RED LF	350	54.4%	190	
2018 12	04-01-0945-DRUM	WEATHER-MASTER XT 102 YELLOW LF	350	54.4%	190	
2018 12	04-01-0951-DRUM	WEATHER-MASTER XT 476 BROWN LF	1,050	54.4%	571	
2018 12	04-01-0952-DRUM	WEATHER-MASTER XT 187 RED LF	760	54.4%	413	
2018 12	04-01-0953-DRUM	WEATHER-MASTER XT 108 YELLOW LF	350	54.4%	190	
2018 12	04-01-0970-DRUM	WEATHER-MASTER XT 355 GREEN LF	350	54.4%	190	
2018 12	04-01-1163-PAIL	WEATHERMASTER XT 349 GREEN LF	74	54.4%	40	
2018 12	04-01-1472-PAIL	WEATHERMASTER XT 1595 ORANGE LF	111	54.4%	60	
2018 12	04-01-1526-PAIL	WEATHERMASTER XT 807 PURPLE LF	74	54.4%	40	
2018 12	04-01-1529-PAIL	WEATHERMASTER XT 2718 BLUE LF	111	54.4%	60	
2018 12	04-01-1758-DRUM	WEATHERMASTER XT WARM GRAY 2C LF	370	54.4%	201	
2018 12	04-01-1759-PAIL	WEATHERMASTER XT WARM GRAY 5C LF	140	54.4%	76	
2018 12	04-01-1760-PAIL	WEATHERMASTER XT 343 GREEN LF	140	54.4%	76	
2018 12	04-01-1763-PAIL	WEATHERMASTER XT 289 BLUE LF	105	54.4%	57	
2018 12	98-0054-PAIL	ARCOSOLVE PNP	70	54.4%	38	
2018 12 Total			16,679		8,290	
Grand Total			166,245		82,555	

STATE OF NORTH CAROLINA
COUNTY OF MOORE

NORTH CAROLINA
ENVIRONMENTAL MANAGEMENT
COMMISSION

IN THE MATTER OF:)
RELIANCE PACKAGING)

CASE NUMBER 2019-056

FOR VIOLATION OF:)
15A NCAC 2D .0611 THERMAL)
OXIDER REQUIREMENTS)

CIVIL PENALTY ASSESSMENT

GENERAL CONDITION B.6 - G.S.)
143-215.108(C)(1) PROPER)
OPERATION)

GENERAL STATUTE 143-215.108)
CONSTRUCTION WITHOUT A)
PERMIT)

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Acting pursuant to North Carolina General Statutes (G.S.) 143-215.114A, I, Michael A. Abraczinskas, Director of the Division of Air Quality (DAQ), make the following:

I. FINDINGS OF FACT:

A. Reliance Packaging is an offset printing operation located in Aberdeen, Moore County. The facility produces various plastic bag products for items such as gardening mulch. ✓

B. On 17 August 2018, Reliance Packaging was issued Air Quality Permit 10586R00, with an expiration date of 31 July 2026. This permit contains the following conditions: ✓

General Condition B.6, requires that "...In accordance with G.S. 143-215.108(c)(1), the facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air cleaning device(s) and appurtenances." ✓

Specific Condition and Limitation A.8: 15A NCAC 02D .0611 – Thermal Oxidizer Requirements requires that: A) "...VOC, HAP, and TAP emissions shall be controlled as described in the permitted equipment list." The permitted equipment list states that emissions from the 8 Color Flexographic Printing Press PCMC 7991 (Source ID No. ES-1) and 6 Color Flexographic Printing Press Schiavi//Padane Sirio 146 (Source ID No. ES-2) are controlled by the Natural Gas-fired Regenerative Thermal Oxidizer (RTO), and B) the Permittee shall: 1) maintain the temperature in the regenerative thermal oxidizer (RTO) at a minimum of 1,500 degrees Fahrenheit, based on a 3-hour rolling average; 2) continuously monitor and record the temperature in the thermal oxidizer while it is operating; and 3) maintain records on-site and in a form that is readily available for expeditious inspection and review. ✓

- C. On 13 March 2019, Stephen Allen and Abdul Kadir, both with the Fayetteville Regional Office of the Division of Air Quality (FRO DAQ), met with Tom Prots, General Manager, and John Van Der Noord, Maintenance Manager, to conduct a full air quality compliance inspection of Reliance Packaging, in Aberdeen. During the inspection it was observed and documented that the presses were running while the regenerative thermal oxidizer (RTO) was not operating. Additionally, the facility did not have records for the thermal oxidizer documenting the 1,500 degree (F) temperature had been maintained on a three-hour rolling average for any of the months the facility has been operating.
- D. On 22 March 2019, FRO DAQ sent Reliance Packaging a Compliance Additional Information (CAI) request seeking information to determine the nature and extent of violations observed and documented during the 13 March 2019 inspection. ✓
- E. On 9 April 2019, FRO DAQ received the facility's response to the CAI request including preliminary emissions data and a statement that the press and thermal oxidizer unit had an interlock in place that prevents the press from running if the thermal oxidizer is not operating. ✓
- F. On 17 April 2019, FRO DAQ issued a Notice of Violation/Notice of Recommendation for Enforcement (NOV/NRE) for the following violations: ✓
15A NCAC 02D .0611 – Thermal Oxidizer Requirements
15A NCAC 02Q .0315 – Limitation to Avoid 15A NCAC 02Q .0501
15A NCAC 02Q .0317 – Limitation to Avoid 15A NCAC 02Q .0530
General Condition B.6 - G.S. 143-215.108(c)(1) Proper Operation
- G. On 7 May 2019, FRO DAQ received the facility's response to the NOV/NRE. Additional information was also received on 14 May 2019 and 6 June 2019. The information provided included updated VOC emissions calculations that showed the VOC emissions to be less than 100 tons per year, thus showing Reliance Packaging had not violated 15A NCAC 02Q .0315 – Limitation to Avoid 15A NCAC 02Q .0501 nor 15A NCAC 02Q .0317 – Limitation to Avoid 15A NCAC 02Q .0530.
- H. During the inspection on 13 March 2019, Mr. Prots stated the facility was planning on adding a new printing press. Mr. Allen advised that a permit modification would be required and advised Mr. Prots to have the responsible official, Satish Sharma, contact Greg Reeves FRO DAQ Permit Coordinator. ✓
- I. On 20 March 2019, Mr. Allen and Mr. Reeves spoke with Mr. Satish Sharma about the addition of the new printing press. Mr. Reeves advised that the permit modification would require a PE Seal and a zoning determination. Mr. Reeves also stated that construction/installation of the new printing press could not begin until the modified permit was issued by this office. ✓
- J. On 8 May 2019, FRO DAQ received a request for permit modification to add a Natural Gas-fired 8-Color Flexographic printing press Bielloni TELIA 4008 0.794 mmBtu/hr heat input. ✓

- K. On 23 May 2019, Stephen Allen and Abdul Kadir, both of FRO DAQ, conducted a follow-up compliance inspection. They met with facility representatives, Mr. Tom Prots and John Van Der Noord. They observed and documented the installation of a new printing press prior to the permit modification request being completed. The new press was in place with all the control panels installed, supports had been welded in place, and ductwork was in place on top of the press ready to be connected to the existing ductwork controlling ES-1 and ES-2.
- L. On 11 June 2019, FRO DAQ issued an NOV/NRE for violating N.C. General Statute 143-215.108 - Construction of New Air Pollution Sources or Air Cleaning Devices Prior to Obtaining an Air Quality Permit.
- M. On 20 June 2019, FRO DAQ received the facility's response to the NOV/NRE issued on 11 June 2019.
- N. Prior Air Quality History:
3 August 2018: Notice of Violation – N.C. General Statute 143-215.108 - Construction of New Air Pollution Sources or Air Cleaning Devices Prior to Obtaining an Air Quality Permit
- O. The cost of investigation or inspection in this matter totaled \$645. *845*

*Print PO1
issued on 6/20/2019*

Based upon the above Findings of Fact, I make the following:

II. CONCLUSIONS OF LAW:

- A. Reliance Packaging was in violation of 15A NCAC 2D .0611, "Thermal Oxidizer Requirements," for failing to operate, monitor, and maintain records for the thermal oxidizer; General Condition B.6 - G.S. 143-215.108(c)(1) Proper Operation for failing to operate the thermal oxidizer at all times the presses were in operation, and G.S. 143-215.108 for installing the new printing press without a permit.
- B. G.S. 143-215.114A provides that a civil penalty of not more than twenty-five thousand dollars (\$25,000) per violation may be assessed against a person who violates or fails to act in accordance with the terms, conditions, or requirements of a permit required by NCGS 143-215.108 or who violates any regulation adopted by the Environmental Management Commission.
- C. G.S. 143-215.3(a)(9) provides that the costs of any investigation or inspection may be assessed against a person who violates or fails to act in accordance with the terms, conditions, or requirements of a permit required by G.S. 143-215.108 or who violates any regulation adopted by the Environmental Management Commission.

Based upon the above Findings of Fact and Conclusions of Law, I make the following:

III. DECISION:

Reliance Packaging is hereby assessed a civil penalty of:

- \$ _____ For 3,300 violations of 15A NCAC 2D .0611, "Thermal Oxidizer Requirements." *5:7*
- \$ _____ For one (1) violation of General Condition B.6 - G.S. 143-215.108(c)(1) Proper Operation. *1st 136*
- \$ _____ For one (1) violation of General Statute 143-215.108 construction without a permit. *one violation*
- \$ _____ TOTAL CIVIL PENALTY, which is _____ percent of the maximum penalty authorized by G.S. 143-215.114A.
- \$ ~~645~~ *845* Investigation costs
- \$ _____ TOTAL AMOUNT DUE

send now letters

Pursuant to G.S. 143-215.114A in determining the amount of the penalty, I considered the factors listed in G.S. 143B-282.1(b) and 15A NCAC 2J .0006, which are the following:

- 1) The degree and extent of harm to the natural resources of the State, to the public health, or to private property resulting from the violation(s);
- 2) The duration and gravity of the violation(s);
- 3) The effect on ground or surface water quantity or quality or on air quality;
- 4) The cost of rectifying the damage;
- 5) The amount of money saved by noncompliance;
- 6) Whether the violation was committed willfully or intentionally;
- 7) The prior record of the violator in complying or failing to comply with programs over which the Environmental Management Commission has regulatory authority; and
- 8) The cost to the State of the enforcement procedures.

Date

Michael A. Abraczinskas, Director
Division of Air Quality

We toured the facility, starting with the extrusion process where the plastic bags are produced. The area appeared clean and well maintained. We then proceeded to the printing building and observed the thermal oxidizer outside the printing building. The thermal oxidizer was not operating during the inspection. Mr. Van Der Noord showed us the broken control panel on the unit inside the facility and restated that they have no way of retrieving data from the unit.

During the inspection, Mr. Prots stated they were planning on adding a third press. I told Mr. Prots they would need to submit a permit modification and have it approved prior to constructing any new emission sources. I advised them to contact Greg Reeves before proceeding.

13 March 2019

I spoke with Mr. Prots to confirm that the RTO is not running full time when the presses are running. Mr. Prots stated that Mr. Van Der Noord would have more information on the actual run times but state they are not running the thermal oxidizer the majority of the time if they are just one running press. Mr. Prots stated he thought the unit was purchased in 2016 and installed at the end of 2017. Mr. Prots called me back and left a voicemail stating that he'd spoken with Mr. Van Der Noord who said they have been running the thermal oxidizer but they have no way to monitor it and no data from the datalogger due to the broken control panel.

15 March 2019

Heather Carter, Jeff Cole and I spoke with Mr. Prots about the violations found during the inspection. Heather informed Mr. Prots that the permit stipulation requires the thermal oxidizer to be running whenever the presses are running. She also reviewed the record keeping requirements. Mr. Prots stated they have no data to prove the thermal oxidizer has been running since installation. He stated the new control panel should be installed on Monday, 18 March 2019, and from that point on the unit will be running and recording data.

20 March 2019

Greg Reeves and I spoke with Mr. Satish Sharma, President of Reliance Packaging about the new press the facility wanted to install. Mr. Sharma stated they were hoping to have the new press installed by the end of the month. Mr. Reeves told Mr. Sharma the facility would need to submit a permit modification that would require a PE Seal and a zoning determination from the town of Aberdeen. Mr. Reeves stated the facility could not begin installation or construction of the new press prior to the permit modification being approved by our office.

VI. PERMIT STIPULATIONS

A. 15A NCAC 2D .0202 – PERMIT RENEWAL AND EMISSION INVENTORY

REQUIREMENT – The Permittee shall submit a permit renewal application and an air pollution inventory report at least 90 days prior to the expiration of the permit.

APPEARED IN COMPLIANCE – The facility submitted the most recent permit renewal application and emissions inventory on time. The permit will expire on 31 July 2026. The next permit renewal application and emissions inventory for calendar year 2026 will be due on or before 2 May 2026.

B. 15A NCAC 2D .0515 – PARTICULATES CONTROL REQUIREMENT – Particulate emissions shall not exceed allowable emission rates as calculated by the following equations:

$$\begin{array}{ll} E = 4.10 * (P)^{0.67} & \text{for } P \leq 30 \text{ tons/hr, or} \\ E = 55 * (P)^{0.11} - 40 & \text{for } P > 30 \text{ tons/hr} \end{array}$$

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Inspection Report
Date: 03/19/2019

Fayetteville Regional Office
Reliance Packaging
NC Facility ID 6300110
County/FIPS: Moore/125

Facility Data			Permit Data				
Reliance Packaging 175 Anderson Street Aberdeen, NC 28315 Lat: 35d 8.1466m Long: 79d 26.1264m SIC: 2673 / Bags: Plastics, Laminated And Coated NAICS: 322223 / Plastics, Foil, and Coated Paper Bag Manufacturing			Permit 10586 / R00 Issued 8/17/2018 Expires 7/31/2026 Class/Status Synthetic Minor Permit Status Active Current Permit Application(s) None				
Contact Data			Program Applicability				
Facility Contact	Authorized Contact	Technical Contact	SIP				
Alfonso Pasillas Maintenance Manager (910) 944-2561	Satish Sharma President (910) 944-2561	Chris Maye Senior Environmental Manager (215) 699-4800					
Comments: <i>JOC</i> Inspector's Signature: <i>[Signature]</i> <i>AP</i> Date of Signature: 3/19/19			Compliance Data				
			Inspection Date 03/13/2019 Inspector's Name Stephen Allen Operating Status Operating Compliance Code Compliance - inspection Action Code FCE On-Site Inspection Result Violation				
Total Actual emissions in TONS/YEAR:							
	TSP	SO2	NOX	VOC	CO	PM10	* HAP
No emissions inventory on record. The emissions inventory is due 05/02/2026. * Highest HAP Emitted (in pounds)							
Five Year Violation History:							
<u>Date</u>	<u>Letter Type</u>	<u>Rule Violated</u>				<u>Violation Resolution Date</u>	
08/03/2018	NOV	NCGS 143-215.108A Control of sources of air pollution; construction of new facilities; alteration or expansion of exis				08/03/2018	
Performed Stack Tests since last FCE: None							
<u>Date</u>	<u>Test Results</u>	<u>Test Method(s)</u>	<u>Source(s) Tested</u>				

- I. DIRECTIONS TO FACILITY**
 From FRO: Follow Murchison Rd, NC-210 N and N Bragg Blvd to NC-690 W/Vass Rd in Spring Lake. Turn left onto NC-690 W/Vass Rd (19 miles). Merge onto US-1 S (12 miles). Turn right onto NC-5 N/W South St. (0.6 miles). Turn left on Anderson Street, facility is on the left.

ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL A. ABRACZINSKAS
Director



NORTH CAROLINA
Environmental Quality

August 17, 2018

Mr. Satish Sharma
President
Reliance Packaging
175 Anderson Street
Aberdeen, NC 28315

Permit

Subject: Air Permit No. 10586R00
Reliance Packaging
Aberdeen, Moore County, North Carolina
Permit Class: Synthetic Minor
Facility ID# 6300110

Dear Mr. Sharma:

In accordance with your completed application received August 2, 2018, we are forwarding herewith Permit No. 10586R00 to Reliance Packaging, Aberdeen, Moore County, North Carolina for the construction and operation of air emissions sources or air cleaning devices and appurtenances. Additionally, any emissions activities determined from your air permit application as meeting the exemption requirements contained in 15A NCAC 2Q .0102 have been listed for information purposes as an "ATTACHMENT" to the enclosed air permit. Please note the records retention requirements are contained in General Condition 2 of the General Conditions and Limitations.

If any parts, requirements, or limitations contained in this permit are unacceptable to you, you have the right to request a formal adjudicatory hearing within 30 days following receipt of this permit, identifying the specific issues to be contested. Such a request will stay the effectiveness of the entire permit. This hearing request must be in the form of a written petition, conforming to G.S. 150B-23 of the North Carolina General Statutes, and filed with the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, NC 27699-6714. The form for requesting a formal adjudicatory hearing may be obtained upon request from the Office of Administrative Hearings. Unless a request for a hearing is made pursuant to G.S. 150B-23, this air permit shall be final and binding.

You may request modification of your air permit through informal means pursuant to G.S. 150B-22. This request must be submitted in writing to the Director and must identify the specific provisions or issues for which the modification is sought. Please note that the permit will become final and binding regardless of a request for informal modification unless a request for a hearing is also made under G.S. 150B-23.



North Carolina Department of Environmental Quality | Division of Air Quality

Fayetteville Regional Office | 225 Green Street, Suite 714 | Fayetteville, NC 28301-5094

910.433.3300 T | 910.485.7467 F

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Unless exempted by a condition of this permit or the regulations, construction of new air pollution sources or air cleaning devices, or modifications to the sources or air cleaning devices described in this permit must be covered under a permit issued by the Division of Air Quality prior to construction. Failure to do so is a violation of G.S. 143-215.108 and may subject the Permittee to civil or criminal penalties as described in G.S. 143-215.114A and 143-215.114B.

This permit shall be effective from August 17, 2018 until July 31, 2026, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein.

Changes have been made to the permit stipulations. The Permittee is responsible for carefully reading the entire permit and evaluating the requirements of each permit stipulation. The Permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. Noncompliance with any permit condition is grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application. Should you have any questions concerning this matter, please contact Gregory Reeves at 910-433-3373.

Sincerely,

Heather Carter, Regional Supervisor
Division of Air Quality, NC DEQ

GWR
Enclosures

c: Fayetteville Regional Office

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION

DEPARTMENT OF ENVIRONMENTAL QUALITY

DIVISION OF AIR QUALITY

AIR PERMIT NO. 10586R00

Issue Date: August 13, 2018
Expiration Date: July 31, 2026

Effective Date: August 13, 2018
Replaces Permit: (new)

To construct and operate air emission source(s) and/or air cleaning device(s), and for the discharge of the associated air contaminants into the atmosphere in accordance with the provisions of Article 21B of Chapter 143, General Statutes of North Carolina (NCGS) as amended, and other applicable Laws, Rules and Regulations,

Reliance Packaging
175 Anderson Street
Aberdeen, Moore County, North Carolina
Permit Class: Synthetic Minor
Facility ID# 6300110

(the Permittee) is hereby authorized to construct and operate the air emissions sources and/or air cleaning devices and appurtenances described below:

Emission Source ID	Emission Source Description	Control System ID	Control System Description
ES-1	8 Color Flexographic Printing Press PCMC 7991 with electric heaters	CD1	Natural Gas-fired Regenerative Thermal Oxidizer 4 mmBtu/hr maximum heat input
ES-2	6-Color Flexographic Printing Press Schiavi//Padane Sirio 146 with electric heaters		

in accordance with the completed application 6300110.18A received August 2, 2018 including any plans, specifications, previous applications, and other supporting data, all of which are filed with the Department of Environmental Quality, Division of Air Quality (DAQ) and are incorporated as part of this permit.

This permit is subject to the following specified conditions and limitations including any **TESTING, REPORTING, OR MONITORING REQUIREMENTS:**

A. SPECIFIC CONDITIONS AND LIMITATIONS

1. Any air emission sources or control devices authorized to construct and operate above must be operated and maintained in accordance with the provisions contained herein. The Permittee shall comply with applicable Environmental Management Commission Regulations, including Title 15A North Carolina Administrative Code (NCAC), Subchapter 2D .0202, 2D .0515, 2D .0516, 2D .0521, 2D .0535, 2D .0540, 2D .0611, 2D .1806, 2Q .0315, 2Q .0317 (Avoidance) and 2Q .0711.
2. PERMIT RENEWAL AND EMISSION INVENTORY REQUIREMENT - The Permittee, at least 90 days prior to the expiration date of this permit, shall request permit renewal by letter in accordance with 15A NCAC 2Q .0304(d) and (f). Pursuant to 15A NCAC 2Q .0203(i), no permit application fee is required for renewal of an existing air permit (without a modification request). The renewal request (with AA application form) should be submitted to the Regional Supervisor, DAQ. Also, at least 90 days prior to the expiration date of this permit, the Permittee shall submit the air pollution emission inventory report (with Certification Sheet) in accordance with 15A NCAC 2D .0202, pursuant to N.C. General Statute 143 215.65. The report shall be submitted to the Regional Supervisor, DAQ and shall document air pollutants emitted for the 2025 calendar year.
3. PARTICULATE CONTROL REQUIREMENT - As required by 15A NCAC 2D .0515 "Particulates from Miscellaneous Industrial Processes," particulate matter emissions from Printing Press #1 (ID No. ES-1) and Printing Press #2 (ID No. ES-2) shall not exceed allowable emission rates. The allowable emission rates are, as defined in 15A NCAC 2D .0515, a function of the process weight rate and shall be determined by the following equation(s), where P is the process throughput rate in tons per hour (tons/hr) and E is the allowable emission rate in pounds per hour (lbs/hr).

$$E = 4.10 * (P)^{0.67} \quad \text{for } P \leq 30 \text{ tons/hr, or}$$

$$E = 55 * (P)^{0.11} - 40 \quad \text{for } P > 30 \text{ tons/hr}$$

4. SULFUR DIOXIDE CONTROL REQUIREMENT - As required by 15A NCAC 2D .0516 "Sulfur Dioxide Emissions from Combustion Sources," sulfur dioxide emissions from Natural Gas-fired Regenerative Thermal Oxidizer, 4 mmBtu/hr maximum heat input (ID No. CD1) shall not exceed 2.3 pounds per million Btu heat input.
5. VISIBLE EMISSIONS CONTROL REQUIREMENT - As required by 15A NCAC 2D .0521 "Control of Visible Emissions," visible emissions from Printing Press #1 (ID No. ES-1) and Printing Press #2 (ID No. ES-2), manufactured after July 1, 1971, shall not be more than 20 percent opacity when averaged over a six-minute period, except that six-minute periods averaging not more than 87 percent opacity may occur not more than once in any hour nor more than four times in any 24-hour period. However, sources which must comply with a visible emissions standard in 15A NCAC 2D .0524 "New Source Performance Standards" or .1110 "National Emission Standards for Hazardous Air Pollutants" shall meet that standard instead of the 2D .0521 visible emissions standard.

6. NOTIFICATION REQUIREMENT - As required by 15A NCAC 2D .0535, the Permittee of a source of excess emissions that last for more than four hours and that results from a malfunction, a breakdown of process or control equipment or any other abnormal conditions, shall:
- a. Notify the Director or his designee of any such occurrence by 9:00 a.m. Eastern time of the Division's next business day of becoming aware of the occurrence and describe:
 - i. the name and location of the facility,
 - ii. the nature and cause of the malfunction or breakdown,
 - iii. the time when the malfunction or breakdown is first observed,
 - iv. the expected duration, and
 - v. an estimated rate of emissions.
 - b. Notify the Director or his designee immediately when the corrective measures have been accomplished.

This reporting requirement does not allow the operation of the facility in excess of Environmental Management Commission Regulations.

7. FUGITIVE DUST CONTROL REQUIREMENT - As required by 15A NCAC 2D .0540 "Particulates from Fugitive Dust Emission Sources," the Permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints are received or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR, Appendix A), the owner or operator may be required to submit a fugitive dust plan as described in 2D .0540(f).

"Fugitive dust emissions" means particulate matter that does not pass through a process stack or vent and that is generated within plant property boundaries from activities such as: unloading and loading areas, process areas stockpiles, stock pile working, plant parking lots, and plant roads (including access roads and haul roads).

8. THERMAL OXIDIZER REQUIREMENTS - As required by 15A NCAC 2D .0611, VOC, HAP, and TAP emissions shall be controlled as described in the permitted equipment list.
 - a. Inspection and Maintenance Requirements To comply with the provisions of this permit and ensure that emissions do not exceed the regulatory limits, the Permittee shall perform periodic inspections and maintenance (I&M) as recommended by the manufacturer. As a minimum, the Permittee shall perform an annual (for each 12 month period following the initial inspection) internal inspection of each primary heat exchanger and associated inlet/outlet valves to ensure structural integrity.
 - b. Monitoring Requirements - The Permittee shall ensure the proper performance of each thermal oxidizer by monitoring the following operational parameters:
 - i. The Permittee shall maintain the temperature in the oxidizer at a minimum of 1,500 degrees Fahrenheit, based on a 3-hour rolling average.
 - ii. These approved parameters shall apply at all times except as noted in the following:
 - A. The Permittee may re-establish the minimum 3-hour average oxidizer temperature during subsequent testing. Minimum destruction efficiency of 95% must be demonstrated at the lower temperature. Compliance with previously approved parameters is not required during subsequent required testing undertaken to re-establish parameters by the Permittee.
 - B. The Permittee shall comply with applicable emission standards at all times, including during periods of testing.
 - C. Upon successful DAQ-approved testing that demonstrates compliance with the 95% destruction efficiency at a lower oxidizer temperature, the Permittee shall submit a permit application within 60 days of the approved test results to modify the air permit to include the new temperature parameter.
 - c. Recordkeeping Requirements
 - i. The Permittee shall continuously record the maximum temperature in the oxidizer.
 - ii. The results of all inspections and any variance from manufacturer's recommendations or from those given in this permit (when applicable) shall be investigated with corrections made and dates of actions recorded in a logbook. Records of all maintenance activities shall be recorded in the logbook. The logbook (in written or electronic form) shall be kept on-site and made available to DAQ personnel upon request.

9. CONTROL AND PROHIBITION OF ODOROUS EMISSIONS - As required by 15A NCAC 2D .1806 "Control and Prohibition of Odorous Emissions" the Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary.
10. LIMITATION TO AVOID 15A NCAC 2Q .0501 - Pursuant to 15A NCAC 2Q .0315 "Synthetic Minor Facilities," to avoid the applicability of 15A NCAC 2Q .0501 "Purpose of Section and Requirement for a Permit," as requested by the Permittee, facility-wide emissions shall be less than the following:

Pollutant	Emission Limit (Tons per consecutive 12-month period)
VOC	100

- a. Operations Restrictions - To ensure emissions do not exceed the limitations above, the following restrictions shall apply:
- i. VOC emissions shall be controlled as described in the permitted equipment list.
 - ii. The Permittee shall conduct periodic inspection and maintenance of the thermal oxidizer system per the requirements of the 15A NCAC 02D .0611 "Thermal Oxidizer Requirements" permit condition.
 - iii. The Permittee shall maintain the temperature in the thermal oxidizer per the requirements of the 15A NCAC 02D .0611 "Thermal Oxidizer Requirements" permit condition.
- b. Recordkeeping Requirements
- i. The Permittee shall maintain records of the temperature in the thermal oxidizer per the requirements of the 15A NCAC 02D .0611 "Thermal Oxidizer Requirements" permit condition.

11. LIMITATION TO AVOID 15A NCAC 2D .0530 "PREVENTION OF SIGNIFICANT DETERIORATION" - In accordance with 15A NCAC 2Q .0317, to comply with this permit and avoid the applicability of 15A NCAC 2D .0530 "Prevention of Significant Deterioration," as requested by the Permittee, emissions shall be limited as follows:

Affected Source(s)	Pollutant	Emission Limit (Tons Per Consecutive 12-month Period)
Facility Wide	VOC	250

a. Operations Restrictions and Recordkeeping Requirements - The Permittee shall comply with the operations restrictions and recordkeeping requirements by complying with the operations restrictions and recordkeeping requirements of the 15A NCAC 02Q .0315 "Synthetic Minor Facilities" permit condition.

12. TOXIC AIR POLLUTANT EMISSIONS LIMITATION REQUIREMENT - Pursuant to 15A NCAC 2Q .0711 "Emission Rates Requiring a Permit," for each of the below listed toxic air pollutants (TAPs), the Permittee has made a demonstration that facility-wide actual emissions, where one or more emission release points are obstructed or non-vertically oriented, do not exceed the Toxic Permit Emission Rates (TPERs) listed in 15A NCAC 2Q .0711(a). The facility shall be operated and maintained in such a manner that emissions of any listed TAPs from the facility, including fugitive emissions, will not exceed TPERs listed in 15A NCAC 2Q .0711(a).

- a. A permit to emit any of the below listed TAPs shall be required for this facility if actual emissions from all sources will become greater than the corresponding TPERs.
- b. PRIOR to exceeding any of these listed TPERs, the Permittee shall be responsible for obtaining a permit to emit TAPs and for demonstrating compliance with the requirements of 15A NCAC 2D .1100 "Control of Toxic Air Pollutants".
- c. In accordance with the approved application, the Permittee shall maintain records of operational information demonstrating that the TAP emissions do not exceed the TPERs as listed below:

Pollutant	Chronic Toxicants (lb/day)	Acute Systemic Toxicants (lb/hr)	Acute Irritants (lb/hr)
Ethyl acetate (141-78-6)		36	
MEK (methyl ethyl ketone, 2-butanone) (78-93-3)	78		22.4
Toluene (108-88-3)	98		14.4
Xylene (mixed isomers) (1330-20-7)	57		16.4

B. GENERAL CONDITIONS AND LIMITATIONS

1. In accordance with G.S. 143-215.108(c)(1), TWO COPIES OF ALL DOCUMENTS, REPORTS, TEST DATA, MONITORING DATA, NOTIFICATIONS, REQUESTS FOR RENEWAL, AND ANY OTHER INFORMATION REQUIRED BY THIS PERMIT shall be submitted to the:

Regional Supervisor
North Carolina Division of Air Quality
Fayetteville Regional Office
System Building
225 Green Street, Suite 714
Fayetteville, NC 28301-5094
910-433-3300

For identification purposes, each submittal should include the facility name as listed on the permit, the facility identification number, and the permit number.

2. RECORDS RETENTION REQUIREMENT - In accordance with 15A NCAC 2D .0605, any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon request. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. These records must be kept on site for a minimum of 2 years, unless another time period is otherwise specified.
3. ANNUAL FEE PAYMENT - Pursuant to 15A NCAC 2Q .0203(a), the Permittee shall pay the annual permit fee within 30 days of being billed by the DAQ. Failure to pay the fee in a timely manner will cause the DAQ to initiate action to revoke the permit.
4. EQUIPMENT RELOCATION - In accordance with 15A NCAC 2Q .0301, a new air permit shall be obtained by the Permittee prior to establishing, building, erecting, using, or operating the emission sources or air cleaning equipment at a site or location not specified in this permit.
5. REPORTING REQUIREMENT - In accordance with 15A NCAC 2Q .0309, any of the following that would result in previously unpermitted, new, or increased emissions must be reported to the Regional Supervisor, DAQ:
 - a. changes in the information submitted in the application regarding facility emissions;
 - b. changes that modify equipment or processes of existing permitted facilities; or
 - c. changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be made by the DAQ to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

6. In accordance with 15A NCAC 2Q .0309, this permit is subject to revocation or modification by the DAQ upon a determination that information contained in the application or presented in the support thereof is incorrect, conditions under which this permit was granted have changed, or violations of conditions contained in this permit have occurred. In accordance with G.S. 143-215.108(c)(1), the facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air cleaning device(s) and appurtenances.
7. In accordance with G.S. 143-215.108(c)(1), this permit is nontransferable by the Permittee. Future owners and operators must obtain a new air permit from the DAQ.
8. In accordance with G.S. 143-215.108(c)(1), this issuance of this permit in no way absolves the Permittee of liability for any potential civil penalties which may be assessed for violations of State law which have occurred prior to the effective date of this permit.
9. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with all applicable requirements of any Federal, State, or Local water quality or land quality control authority.
10. In accordance with 15A NCAC 2D .0605, reports on the operation and maintenance of the facility shall be submitted by the Permittee to the Regional Supervisor, DAQ at such intervals and in such form and detail as may be required by the DAQ. Information required in such reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and preventive maintenance schedules.
11. A violation of any term or condition of this permit shall subject the Permittee to enforcement pursuant to G.S. 143-215.114A, 143-215.114B, and 143-215.114C, including assessment of civil and/or criminal penalties.
12. Pursuant to North Carolina General Statute 143-215.3(a)(2), no person shall refuse entry or access to any authorized representative of the DAQ who requests entry or access for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.
13. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with any applicable Federal, State, or Local requirements governing the handling, disposal, or incineration of hazardous, solid, or medical wastes, including the Resource Conservation and Recovery Act (RCRA) administered by the Division of Waste Management.
14. PERMIT RETENTION REQUIREMENT - In accordance with 15A NCAC 2Q .0110, the Permittee shall retain a current copy of the air permit at the site. The Permittee must make available to personnel of the DAQ, upon request, the current copy of the air permit for the site.

15. CLEAN AIR ACT SECTION 112(r) REQUIREMENTS - Pursuant to 15A NCAC 2D .2100 "Risk Management Program," if the Permittee is required to develop and register a risk management plan pursuant to Section 112(r) of the Federal Clean Air Act, then the Permittee is required to register this plan with the USEPA in accordance with 40 CFR Part 68.

16. PREVENTION OF ACCIDENTAL RELEASES - GENERAL DUTY - Pursuant to Title I Part A Section 112(r)(1) of the Clean Air Act "Hazardous Air Pollutants - Prevention of Accidental Releases - Purpose and General Duty," although a risk management plan may not be required, if the Permittee produces, processes, handles, or stores any amount of a listed hazardous substance, the Permittee has a general duty to take such steps as are necessary to prevent the accidental release of such substance and to minimize the consequences of any release. **This condition is federally-enforceable only.**

17. GENERAL EMISSIONS TESTING AND REPORTING REQUIREMENTS - If emissions testing is required by this permit, or the DAQ, or if the Permittee submits emissions testing to the DAQ in support of a permit application or to demonstrate compliance, the Permittee shall perform such testing in accordance with 15A NCAC 2D .2600 and follow all DAQ procedures including protocol approval, regional notification, report submittal, and test results approval. Additionally, in accordance with 15A NCAC 2D .0605, the permittee shall follow the procedures for obtaining any required audit sample and reporting those results.

Permit issued this the 13th of August, 2018.

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION

Heather Carter
Regional Supervisor
By Authority of the Environmental Management Commission

Air Permit No. 10586R00

Insignificant / Exempt Activities

Source	Exemption Regulation	Source of TAPs?	Source of Title V Pollutants?
IES-1 Solvent Recovery Still	2Q .0102 (h)(5)	Yes	Yes

-
1. Because an activity is exempted from being required to have a permit or permit modification does not mean that the activity is exempted from an applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement.
 2. When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 2D .1100 "Control of Toxic Air Pollutants" or 2Q .0711 "Emission Rates Requiring a Permit."
 3. Sample permit conditions showing the regulatory requirements for exempt sources subject to NESHAP, NSPS, and NCAC rules may be found here:
<https://deq.nc.gov/about/divisions/air-quality/air-quality-permits/specific-permit-conditions-regulatory-guide>

Reeves, Gregory W

From: Reeves, Gregory W
Sent: Monday, August 6, 2018 1:41 PM
To: pcompton@reliancepkg.com
Subject: RE: [External] Fwd: Temperature Monitoring for Thermal Oxidizer

Paul, we intend to incorporate a permit condition that will require the facility to maintain a minimum temperature in the thermal oxidizer. The permit application indicated the minimum operating temperature is 1,500 deg F. When operating the printing presses, the oxidizer should be started up before the presses and proper temperature should be achieved prior to placing the presses on line.

I can craft the permit either to place a hard limit on the minimum temperature or an average temperature over an appropriate averaging time. My suggestion was a 3-hour period to allow for some fluctuations in the temperature, such than an excursion below the minimum would not immediately become a violation of permit conditions.

In the absence of the capability of the data logger to capture the 3-hour average, we would probably require a manual calculation of this average temperature by the facility personnel in order to demonstrate compliance.

As to the temperature being lowered in the future, that could be done with proper stack testing that demonstrates compliance with adequate destruction efficiency at the lower temperatures. We can discuss this further at your convenience.

In order to get your permit to you as soon as possible, please recommend how you would prefer the limit to be established in the permit.

1. Do you wish to set a hard limit with no averaging time?
2. If so, what temperature are you recommending? (your current application states 1,500 deg F)
3. If an averaging period is used, what period would you recommend, and what temp would be used?

Note that records will be required to be maintained at the facility which document these temperatures. Records will be also be required for any required maintenance and inspection performed on the oxidizer.

Call me to discuss.

Greg Reeves
Permits Coordinator
910-433-3373

-----Original Message-----

From: pcompton@reliancepkg.com [mailto:pcompton@reliancepkg.com]
Sent: Monday, August 06, 2018 10:30 AM
To: Reeves, Gregory W <gregory.reeves@ncdenr.gov>
Cc: ssharma@reliancepkg.com
Subject: [External] Fwd: Temperature Monitoring for Thermal Oxidizer

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Good Morning Gregory, This is what the oxidizer manufacturer sent me, please let me know your thoughts on this.
Thanks, Paul Compton

Allen, Stephen C

From: Chris Maye <cmaye@CompliancePlace.com>
Sent: Tuesday, May 14, 2019 9:47 AM
To: Allen, Stephen C
Cc: Satish Sharma
Subject: [External] RE: Additional information request
Attachments: Reliance-InkSolvent-Usage-Emissions-DEQ.xlsx

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Mr. Allen,

Attached is the spreadsheet that shows the calculations, and contains actual monthly ink reports from the vendor, CAI. This sheet utilizes methods to account for the change in VOC inventory (ink and solvent). The inventory corrections were not initially used to represent worst case emissions values.

Please let me know if you have questions or require clarifications.

Thank you,

Chris

Chris C. Maye, P.E. 
Senior Project Manager
Compliance Management International
1350 Welsh Road, Suite 200 | North Wales, PA 19454
Phone: 215.699.4800x112 | Cell: 215.692.3385 | Fax: 215.699.8315 |
www.complianceplace.com
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From: Allen, Stephen C [mailto:stephen.allen@ncdenr.gov]
Sent: Thursday, May 9, 2019 4:11 PM
To: Chris Maye <cmaye@CompliancePlace.com>
Subject: Additional information request

Mr. Maye,

We are reviewing the response from Reliance Packaging regarding the Notice of Violation issued by our office on April 17th.

We are hoping you can provide us with the excel spreadsheet used to calculate the press and ink solvent use and emissions that was included in the response along with any other supporting material that was used in calculating the potential emissions.

Thanks for your help,



Stephen Allen
Environmental Specialist
Division of Air Quality, Fayetteville Regional Office
910.433.3365 (Office) 225 Green Street, Suite 714
Fayetteville, NC 28301-3643
stephen.allen@ncdenr.gov

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Allen, Stephen C

From: Chris Maye <cmaye@CompliancePlace.com>
Sent: Thursday, June 6, 2019 9:37 AM
To: Allen, Stephen C
Cc: Satish Sharma; Carter, Heather; Reeves, Gregory W; Cole, Jeffrey D
Subject: [External] RE: Additional information request
Attachments: Reliance-InkSolvent-Usage-Emissions-DEQ-r1.xlsx

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Mr. Allen,

We wanted to ensure that the Department fully understands the ink emission calculation method that Reliance was and is using in the emission calculation spreadsheet. The inventory adjustment is a standard inventory management tool that yields usage from purchase data and inventory quantities. The formula used throughout the spreadsheet provided for monthly usage is:

$$\text{Purchase Quantity} + (\text{Start Inventory} - \text{End Inventory}) = \text{Use}$$

For inks and solvents in 2018, the inventory correction was spread out over the entire year, so the calculation was altered to:

$$\text{Purchase Quantity} \times (1 + \% \text{ Adjustment})$$

$$\% \text{ Adjustment} = (\text{Start of year inventory} - \text{End of Year Inventory}) / \text{YTD Purchases}$$

Per your request, all 2019 data and calculations have been altered to month-to-month use calculations:

$$\text{Purchase} + (\text{Previous End of Month Inventory} - \text{Current End of Month Inventory}) = \text{Inv Adj. Use (both ink \& solvent)}$$


Because solvent is 100% VOC, the Inventory-adjusted VOC (Inv Adj. VOC) is equal to use. Because inks are not 100% VOC, the inventory-adjusted VOC is calculated as:

$$\text{VOC Purchase} \times (\text{Inv Adj. Use} / \text{Purchase}) = \text{Inv. Adj. VOC}$$

I hope all of this is clear.

If you have any further questions, please let us know.

Best regards,

Chris C. Maye, P.E. 
Senior Project Manager
Compliance Management International
1350 Welsh Road, Suite 200 | North Wales, PA 19454
Phone: 215.699.4800x112 | Cell: 215.692.3385 | Fax: 215.699.8315|

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From: Allen, Stephen C [mailto:stephen.allen@ncdenr.gov]
Sent: Friday, May 31, 2019 3:15 PM
To: Chris Maye <cmaye@CompliancePlace.com>
Cc: Satish Sharma <ssharma@reliancepkg.com>; Carter, Heather <Heather.Carter@ncdenr.gov>; Reeves, Gregory W <gregory.reeves@ncdenr.gov>; Cole, Jeffrey D <jeffrey.cole@ncdenr.gov>
Subject: Additional information request

Mr. Maye,

We are reviewing the response sent to our office on 3 May 2019 in regards to the Notice of Violation issued by our office on April 17th. In reviewing the excel spreadsheet used to calculate the rolling emissions total we had a concern as to why the 15% adjustment for ink inventory is still being used after 2018. We are requesting you recalculate the monthly and rolling 12-month total VOC emissions for 2019 without the 15% adjustment based on the monthly starting and ending inventories using actual usage without the adjustment. We agreed that the adjustment for 2018 is justifiable, but for 2019 it should be possible to calculate the potential emissions without this adjustment.

If you have any questions please feel free to contact us.



Stephen Allen
Environmental Specialist
Division of Air Quality, Fayetteville Regional Office
910-433-3365 (Office) 225 Green Street, Suite 714
Fayetteville, NC 28301-3048
stephen.allen@ncdenr.gov

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Carter, Heather

From: Satish Sharma <ssharma@reliancepkg.com>
Sent: Wednesday, July 17, 2019 4:32 PM
To: Carter, Heather
Cc: 'Chris Maye'; tom@reliancepkg.com; Allen, Stephen C
Subject: RE: [External] Compliance Additional Information Request

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Dear Ms. Carter:

As discussed previously, hours of press operation are not currently tracked by the facility, partly because this is not currently a requirement of any current permit. Without knowing the context of how this information will be used or is relevant, the following is a list of shift hours per month for the period in question:

Sept '18 - 636 hours
Oct '18 - 709 hours
Nov '18 - 650 hours
Dec '18 - 656 hours
Jan '19 - 708 hours
Feb '19 - 576 hours
March '19 - 600 hours

This data represents an upper bound of hours a press was running; it does not account for press operation downtime, time due to job changeovers (including make ready), and other times when a shift was working at the plant and the presses were not operating.

It would be useful to know how this information is going to be used, as tracking press operation time may be a parameter the facility would consider tracking if there were reasons to do so.

Thank you, and if you need anything else, please let me know.

Kind Regards,

Satish Sharma

Reliance Packaging LLC

A member of the SIGMA PLASTICS GROUP of companies
155 Anderson Street • Aberdeen, NC 28315
TEL: 910-944-2561 • FAX: 910-944-9208
www.reliancepkg.com

From: Carter, Heather [mailto:Heather.Carter@ncdenr.gov]
Sent: Wednesday, July 17, 2019 11:16 AM
To: Satish Sharma
Cc: Chris Maye; tom@reliancepkg.com; Allen, Stephen C
Subject: RE: [External] Compliance Additional Information Request

Just a quick reminder that we have not received the data requested below.
We are comfortable estimating, but an actual accounting of operational hours may be in your best interest.
Please provide the requested data no later than COB today.



Heather Carter
 Regional Supervisor
 Division of Air Quality, Fayetteville Regional Office
 225 Green Street, Suite 714 910.433.3361 (Office)
 Fayetteville, NC 28301-5043
 Heather.Carter@ncdenr.gov

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From: Satish Sharma [mailto:ssharma@reliancepkg.com]
Sent: Tuesday, July 2, 2019 12:22 PM
To: Carter, Heather <Heather.Carter@ncdenr.gov>
Cc: Chris Maye <cmaye@complianceplace.com>; tom@reliancepkg.com; Allen, Stephen C <stephen.allen@ncdenr.gov>
Subject: Re: [External] Compliance Additional Information Request

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Ms Carter,

We are closing the factory this week for the July 4th holiday but will gather the required information and send to you by next week.

Thank you,

Satish Sharma
 Reliance Packaging

On Jul 2, 2019, at 11:24 AM, Carter, Heather <Heather.Carter@ncdenr.gov> wrote:

Mr. Sharma/Mr. Maye,
 I think we asked before about hours of printing press operations by month, but we let it slip off our radar.

At this time we need you to submit daily or monthly hours of printing press operations from September 2018 through March 2019.

Please response as soon as possible with this information.

Thank you.

<image001.jpg>

From: Satish Sharma [mailto:ssharma@reliancepkg.com]
Sent: Thursday, April 4, 2019 1:09 PM
To: Carter, Heather <Heather.Carter@ncdenr.gov>; Allen, Stephen C <stephen.allen@ncdenr.gov>
Cc: 'Chris Maye' <cmaye@CompliancePlace.com>; tom@reliancepkg.com
Subject: [External] Compliance Additional Information Request

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Ms. Heather Carter
Regional Supervisor – Fayetteville Regional Office
 NCDEQ, Division of Air Quality

225 Green Street, Suite 714
Fayetteville, NC 28301-5094

Reliance Packaging, Permit No. 10586/R00
Aberdeen, NC Moore County, Facility ID: 6300110

Dear Ms. Carter,

Please find attached information as requested.

We have also sent a hard copy of this response to your attention by mail.

Thank you,

Satish Sharma

Reliance Packaging LLC

A member of the SIGMA PLASTICS GROUP of companies
155 Anderson Street • Aberdeen, NC 28315
TEL: 910-944-2561 • FAX: 910-944-9208

Vanderkop, Amy

From: Lowery-jacobs, Evangelyn
Sent: Thursday, July 18, 2019 3:40 PM
To: Vanderkop, Amy
Cc: Carter, Heather
Subject: Normal Track ENF Case #2019-056 - Reliance Packaging LLC
Attachments: 20190718 ENF Mult Violations hsc.doc; 20190717 ENF Mult Violations Addendum B.pdf; 20190717 ENF Mult Violations pics.pdf

Amy,

Please find attached the following documents in support of the enforcement against Reliance Packaging LLC:
ENF document – Word

Supporting documentation (Insp Rpt_13 March; CAI; CAI Response; NOV/NRE_17 April; Insp Rpt and Photos_23 May;
Signed Return Receipt and NOV/NRE; NOV/NRE Response; Emails) – PDF

Let me know if you need additional information.

Thanks!



Evangelyn Lowery-Jacobs
Environmental Engineer
Division of Air Quality, Fayetteville Regional Office
225 Green Street, Suite 714 910.433.3375 (Office)
Fayetteville, NC 28301-5043 910.485.7467 (Fax)
evangelyn.lowery-jacobs@ncdenr.gov

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Vanderkop, Amy

From: Vanderkop, Amy
Sent: Friday, July 19, 2019 8:30 AM
To: Spiller, Asher
Subject: Normal Track Case - 2019-056 - Reliance Packaging
Attachments: 2019-056 Reliance Packaging.pdf

Asher,

I'm attaching a Normal Track case for your review, as part of our procedure. Please note that Thaochi has not reviewed it yet. Additionally, it won't be on the schedule until the December 4-5th Regional Supervisors' meeting.

Thanks,
Amy



Amy Vanderkop
Administrative Specialist II, Division of Air Quality
North Carolina Department of Environmental Quality
919.707.8432 (Office/Fax) 1641 Mail Service Center
Amy.Vanderkop@ncdenr.gov Raleigh, NC 27699-1641

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Reliance Packaging
22 March 2019
Page 2

Be advised that, without records to document the operation of the regenerative thermal oxidizer concurrent with the operation of the printing presses, the VOC emissions will need to be calculated as uncontrolled.

We appreciate your immediate attention and response to this request for information. If you have any questions regarding the information requested above, please contact Stephen Allen, Environmental Specialist, or me, at (910) 433-3300.

Sincerely,



Heather S. Carter
Regional Supervisor
NCDEQ, Division of Air Quality

HSC\asca

cc: FRO Facility Files



North Carolina Department of Environmental Quality | Division of Air Quality
Payetteville Regional Office | 229 South Salisbury Street | Fayetteville, North Carolina 28304-5094
910.433.3300 | Fax 910.433.4567

Σ
Reliance Packaging
Of Sigma Plastics Group

ATTACHMENT 2

Water-based Flexographic Ink SDS (Toyo)

Vanderkop, Amy

From: Abraczinskas, Michael
Sent: Monday, January 27, 2020 8:02 AM
To: Vanderkop, Amy; Vu, Thaochi; Saunders, Gary; Carter, Heather
Subject: FW: [External] Reliance Packaging
Attachments: Justification for Remission.pdf



Mike Abraczinskas, EIT, CPM
Director, Division of Air Quality
North Carolina Department of Environmental Quality
1641 Mail Service Center 919.707.8447 (Office)
Raleigh, NC 27699-1641
Michael.Abraczinskas@ncdenr.gov

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From: Satish Sharma [mailto:ssharma@reliancepkg.com]
Sent: Friday, January 24, 2020 1:09 PM
To: Abraczinskas, Michael <michael.abraczinskas@ncdenr.gov>
Subject: [External] Reliance Packaging

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Mr. Michael Abraczinskas,

Please find attached copy of our request for remission that will be delivered in person today at your Fayetteville office.

Thank you,

Satish Sharma

Reliance Packaging LLC
155 Anderson Street • Aberdeen, NC 28315
TEL: 910-944-2561 • FAX: 910-944-9208

Enforcement New Case Data Sheet

DAQ 2019-056

Case Sent to RCO: 07/18/2019 Case Received RCO: 07/18/2019

Return Receipt:

Violator: Reliance Packaging
Contact: Mr. Satish Sharma, President
 175 Anderson St.
 Aberdeen, NC 28315

CPA Date: 12/20/2019

Violation(s)	Occur	Number Assessed	Violation Begin Date	NOV Date	Penalty Code	Penalty Amount	Overage Amount	Overage Code
2D .0611 Monitoring Emissions from Other Sources	3,300 ✓	3,300	08/17/2018	06/11/2019	5.7	\$ 8,229		
2Q .0315 Synthetic Minor Facilities	1		08/17/2018	04/17/2019				
2Q .0317 Avoidance Conditions	1		08/17/2018	06/11/2019				
NCGS 143-215.108 Control of sources of air pollution; permits required.	1	1	08/17/2018	04/17/2019	1.1	\$ 1,000		
2D .0611 Monitoring Emissions from Other Sources	1		08/17/2018	06/11/2019				
NCGS 143-215.108 Control of sources of air pollution; permits required.	1		05/23/2019	04/17/2019	1.1	\$ 1,000		
NCGS 143-215.108 Control of sources of air pollution; permits required.	1		05/23/2019	04/17/2019				
NCGS 143-215.108 Control of sources of air pollution; permits required.	1		05/23/2019	06/11/2019				
NCGS 143-215.108 Control of sources of air pollution; permits required.	1		05/23/2019	04/17/2019				
NCGS 143-215.108 Control of sources of air pollution; permits required.	1		05/23/2019	04/17/2019				

Total Assessed: \$ 9,229

Investigation Costs: \$ 845

Total Amount Due: \$ 10,074

Region: FRO
County: Moore
CountyPrem: 6300110

Enforcement New Case Data Sheet

Permit Class: Synthetic Minor

Track Type: Normal

Enforcement Officer:

