

21 April 2005

Mr. Drew Peters
Environmental Manager
TORAY PLASTICS (AMERICA), INC.
50 Belver Avenue
North Kingstown, RI 02852

Dear Mr. Peters:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for a modification to your process equipment at your facility, located at 50 Belver Avenue, North Kingstown, RI.

Enclosed is a revised minor source permit issued pursuant to our review of your application (Approval Nos. 1740-1742).

If there are any questions concerning this permit, please contact me at 222-2808, extension 7011.

Sincerely,

Douglas L. McVay
Associate Supervising Engineer
Office of Air Resources

cc: North Kingstown Building Official
Kelly Cowan - ESS

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES

MINOR SOURCE PERMIT

TORAY PLASTICS (AMERICA), INC.

APPROVAL NOs. 1740-1742

Pursuant to the provisions of Air Pollution Control Regulation No. 9, this minor source permit is issued to:

Toray Plastics (America), Inc.

For the following:

Modification of coating operations on the three existing polyester film lines (L1, L2, and L3) to include a Gravure Coater. The Gravure Coater will be interchangeable with the existing Meyer Rod Coaters on the film lines.

Located at: *50 Belver Avenue, North Kingstown*

This permit shall be effective from the date of its issuance and shall remain in effect until revoked by or surrendered to the Department. This permit does not relieve *Toray Plastics (America), Inc.* from compliance with applicable state and federal air pollution control rules and regulations. The design, construction and operation of this equipment shall be subject to the attached permit conditions and emission limitations.

**Stephen Majkut, Chief
Office of Air Resources**

Date of Issuance

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES**

Permit Conditions and Emission Limitations

Toray Plastics (America), Inc.

Approval Nos. 1740-1742

(Revised April 2005)

A. Emission Limitations

1. Volatile Organic Compounds (VOC)

- a. The VOC content of all coatings used in polyester film coating operations on film lines L1, L2 and L3 shall not exceed 2.9 lbs. of VOC per gallon of coating (minus water and exempt compounds).
- b. The total quantity of volatile organic compound emissions discharged to the atmosphere from polyester film coating operations on film lines L1, L2, and L3 shall not exceed:
 - (1) 10,000 pounds in any one month; and,
 - (2) 30,000 pounds in any consecutive 12-month period.

2. Hazardous Air Pollutant (HAP)

The total quantity of HAP emissions discharged to the atmosphere from polyester film coating operations on film lines L1, L2, and L3 shall not exceed 2,500 pounds of any combination of HAPs per calendar month based upon a 12 month rolling average.

3. Listed Toxic Air Contaminant

- a. The total quantity of 1,4 Dioxane emissions discharged to the atmosphere from polyester film coating operations on film lines L1, L2 and L3 shall not exceed:
 - (1) 0.20 grams per hour; and,
 - (2) 3.9 pounds in any consecutive 12-month period.

- b. The total quantity of ethylene glycol emissions discharged to the atmosphere from polyester film coating operations on film lines L1, L2 and L3 shall not exceed:
 - (1) 3.89 pounds per hour; and,
 - (2) 18,000 pounds in any consecutive 12-month period.
- c. The following listed toxic air contaminants shall not be discharged to the atmosphere from polyester film coating operations on film lines L1, L2 and L3: acetaldehyde, antimony trioxide, arsenic, 1,3 butadiene, cadmium, chromium, formaldehyde, hydrogen chloride, nickel, nitric acid and vanadium.
- d. The total quantity of emissions discharged to the atmosphere from the entire facility, for any listed toxic air contaminant not identified in paragraphs a, b or c above, shall not exceed the minimum quantity for that contaminant as specified in Appendix A of Air Pollution Control Regulation No. 9. Emissions from activities exempted from the provisions of APC Regulation No. 22 in subsection 22.2.2 are not included in this limitation.

B. Compliance Demonstration and Testing

1. VOC Content of Coatings Formulated On-Site

- a. For each coating that is formulated on-site (by thinning or mixing with another material), the VOC content of the coating shall be determined by:
 - (1) Maintaining batch formulation information documenting the VOC content of each coating; or,
 - (2) Using EPA Method 24 or an alternative procedure approved by EPA and the Office of Air Resources. Sampling procedures shall follow the guidelines presented in “Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A,” EPA-340/1-91-010.
- b. If the VOC content of a coating determined by an EPA Method 24 test is greater than that indicated by the facility’s formulation data, the EPA Method 24 test shall govern.

2. VOC Content of Coatings As-Supplied

- a. For each coating that is not formulated on-site by thinning or mixing with another material (“as-supplied”), the VOC content of the coating shall be determined by documentation furnished by the coating supplier or an outside laboratory that provides the VOC content, water content, exempt compounds content, solids content and density of each coating used.
- b. VOC, water, exempt compounds and solids content, by weight, of as-supplied coatings shall be determined with EPA Method 24 or an alternative procedure approved by EPA and the Office of Air Resources. Sampling procedures shall follow the guidelines presented in “Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A”, EPA-340/1-91-010.
- c. If the owner/operator uses a coating that does not release VOC reaction by products during the cure; for example, if all VOC is solvent; the owner/operator may request permission to use batch formulation information to determination VOC content. If the VOC content of a coating determined by an EPA Method 24 test is greater than that indicated by the formulation data, the EPA Method 24 test shall govern.

C. Record Keeping and Reporting

1. The owner/operator shall collect and record all of the following information each month for each of the three film lines (L1, L2, L3):
 - a. The name, identification number and amount of each coating, as applied, on each film line; and,
 - b. The mass of VOC per volume of each coating (excluding water and exempt compounds), as applied, used each month on each film line; and,
 - c. The mass of HAP per volume of each coating, as applied, used each month on each film line; and,
 - d. The mass of any listed toxic air contaminant per volume of each coating, as applied, used each month on each film line; and,
 - e. The type and amount of solvent used for diluents and cleanup operations.

2. The owner/operator shall, on a monthly basis, no later than 5 days after the first of the month, determine the total quantity of VOC discharged to the atmosphere from polyester film coating operations on film lines L1, L2 and L3. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.
3. The owner/operator shall notify the Office of Air Resources in writing within 15 days, whenever the total quantity of volatile organic compound emissions discharged to the atmosphere from polyester film coating operations on film lines L1, L2, and L3 exceeds:
 - a. 10,000 pounds in any one month; or,
 - b. 30,000 pounds in any consecutive 12-month period
4. The owner/operator shall, on a monthly basis, no later than 5 days after the first of the month, determine the total quantity of HAP discharged to the atmosphere from polyester film coating operations on film lines L1, L2 and L3. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.
5. The owner/operator shall notify the Office of Air Resources in writing, within 15 days, whenever the total quantity of HAP emissions discharged to the atmosphere from polyester film coating operations on film lines L1, L2, and L3 exceeds 2,500 pounds of any combination of HAPs per calendar month based upon a 12 month rolling average.
6. The owner/operator shall, on a monthly basis, no later than 5 days after the first of the month, determine the total quantity of each listed toxic air contaminant discharged to the atmosphere from polyester film coating operations on film lines L1, L2 and L3 and the entire facility. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.
7. The owner/operator shall notify the Office of Air Resources in writing, within 15 days, whenever the total quantity of emissions discharged to the atmosphere from polyester film coating operations on film lines L1, L2, and L3 exceeds:
 - (a) 0.20 grams per hour or 3.9 pounds in any consecutive 12-month period for 1,4 dioxane; or,
 - (b) 3.89 pounds per hour or 18,000 pounds in any consecutive 12-month period for ethylene glycol;

8. The owner/operator shall notify the Office of Air Resources in writing, within 15 days, whenever the emissions of acetaldehyde, antimony trioxide, arsenic, 1,3 butadiene, cadmium, chromium, formaldehyde, hydrogen chloride, nickel or vanadium are discharged to the atmosphere from polyester film coating operations on film lines L1, L2, and L3.
9. The owner/operator shall notify the Office of Air Resources in writing, within 15 days, whenever the total quantity of emissions discharged to the atmosphere from the entire facility, of any listed toxic air contaminant not identified in Conditions A.3.a, A.3.b or A.3.c, exceeds the minimum quantity for that contaminant as specified in Appendix A of Air Pollution Control Regulation No. 9
10. The owner/operator shall, at least 30 calendar days before changing the method of compliance from complying coatings to the use of daily-weighted averaging or control devices, comply with all requirements of APC Regulation No. 19, Subsection 19.5.2 or 19.5.4, respectively. Upon changing the method of compliance from the use of complying coatings to daily-weighted averaging or control devices, the owner/operator shall comply with all the requirements of APC Regulation 19 applicable to that compliance method.
11. The owner/operator shall notify the Office of Air Resources of any anticipated noncompliance with the terms of this permit or any other applicable air pollution control rules and regulations.
12. The owner/operator shall notify the Office of Air Resources, in writing, of any noncompliance with the terms of this permit or any other air pollution control rule or regulation within 30 calendar days of becoming aware of such occurrence and supply the Director with the following information
 - a. The name and location of the facility;
 - b. The subject source(s) that caused the noncompliance with the permit term;
 - c. The time and date of first observation of the incident of noncompliance;
 - d. The cause and expected duration of the incident of noncompliance;
 - e. The estimated rate of emissions (expressed in lbs/hr or lbs/day) during the incident and the operating data and calculations used in estimating the emission rate;

- f. The proposed corrective actions and schedule to correct the conditions causing the incidence of noncompliance.
13. The owner/operator shall notify the Office of Air Resources in writing of any planned physical or operational change to any equipment that would:
- a. Change the representation of the facility in the application.
 - b. Alter the applicability of any state or federal air pollution rules or regulations.
 - c. Result in the violation of any terms or conditions of this permit.
 - d. Qualify as a modification under APC Regulation No. 9.

Such notification shall include:

- Information describing the nature of the change.
 - Information describing the effect of the change on the emission of any air contaminant.
 - The scheduled completion date of the planned change.
14. All records required in this permit shall be maintained for a minimum of five years after the date of each record and shall be made available to representatives of the Office of Air Resources upon request.

D. Other Permit Conditions

1. Employees of the Office of Air Resources and its authorized representatives shall be allowed to enter the facility at all reasonable times for the purpose of inspecting any air pollution source, investigating any condition it believes may be causing air pollution or examining any records required to be maintained by the Office of Air Resources.
2. To the extent consistent with the requirements of this permit and applicable federal and state laws, the facility shall be designed, constructed and operated in accordance with the representation of the facility in the permit application dated 30 August 2004.
3. At all times, including periods of startup, shutdown and malfunction, the owner/operator shall, to the extent practicable, maintain and operate the facility in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information

available to the Office of Air Resources, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.