

4 May 2004

Mr. William F. Allen
General Manager, COO
Coim USA
315 Commerce Park Road, Unit 3
North Kingstown, RI 02852

Dear Mr. Allen:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for the installation of process equipment at your facility, located 315 Commerce Park Road, North Kingstown, RI.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval No. 1800).

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

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

MINOR SOURCE PERMIT

COIM USA

APPROVAL NO. 1800

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

Coim USA

For the following:

The installation of a Nordmeccanica Labo Combi 400 laminator to apply solvent-based, water-based, and solvent-free coatings onto paper, film, or foil.

Located at: *315 Commerce Park Road, 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 *Coim USA* 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

Coim USA

Approval No. 1800

A. Emission Limitations

1. Volatile Organic Compound (VOC) Emission Limitations

- a. The total quantity of volatile organic compound emissions discharged to the atmosphere from all surface coating operations shall not exceed 1,666 pounds in any one calendar month.
- b. If the emission limitation in A.1.a is exceeded, the emission limitations specified in Air Pollution Control Regulation 19, Subsection 19.3.1 shall immediately apply.

2. Hazardous Air Pollutant (HAP) Emission Limitations

The total quantity of HAP emissions discharged to the atmosphere from all surface coating operations shall not exceed 1,500 pounds of any one HAP or 4,000 pounds of any combination of HAPs per calendar month based upon a 12-month rolling average.

B. Record Keeping and Reporting

1. The owner/operator shall collect and record all of the following information each month:

- a. The name, identification number and amount used of each coating, as applied; and,
- b. The mass of VOC per volume (excluding water and exempt compounds), as applied, for each coating used; and,
- c. The mass of HAP per volume of each coating used, as applied; and,

- d. 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 all surface coating operations. 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 all surface coating operations exceeds 1,666 pounds in any one calendar month.
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 emissions discharged to the atmosphere from all surface coating operations. 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 all surface coating operations exceeds 1,500 pounds of any one HAP or 4,000 pounds of any combination of HAPs per calendar month based upon a 12-month rolling average.
6. 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.
7. 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.
8. The owner/operator shall notify the Office of Air Resources, in writing, of any noncompliance with the terms of this permit 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.
9. 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.

C. Air Toxics Registration

1. If the stationary source emits a listed toxic air contaminant in an amount greater than the Minimum Quantity for that substance specified in Table III of Air Pollution Control Regulation No. 22 during a calendar year, the owner/operator shall register in writing with the Department on or before 15 April of the following calendar year. The owner or operator of the stationary source shall sign the registration.
2. Registrations shall include, at a minimum, the following information:
 - a. The name and address of the facility;

- b. The name and telephone number of the owner or operator of the facility and of a technical contact person for the facility; and
 - c. For each of the listed toxic air contaminants emitted by the facility in an amount greater than the Minimum Quantity for that substance during the previous calendar year:
 - (1) The name of the substance;
 - (2) The process that emitted the substance;
 - (3) The amount of the substance used at the facility during the previous calendar year,
 - (4) The amount of the substance emitted by the facility during the previous calendar year, and
 - (5) The method used to calculate emissions from the facility.
3. Any listed toxic substance that is present in a mixture shall be included in the registration provided that:
- a. The substance is listed on the Material Safety Data Sheet (MSDS) for that mixture prepared pursuant to the OSHA Hazard Communication Standard (29CFR1910.1200). If the chemical manufacturer claims on the MSDS that the content of the mixture is proprietary information, it is the responsibility of the owner or the operator of the facility using that mixture to determine whether the mixture contains listed toxic substances. A certification from the manufacturer shall be deemed an acceptable determination of whether the mixture contains listed toxic substances; or
 - b. For a mixture, which does not have a MSDS, the concentration of the listed toxic substance in the mixture is at least 1%. A listed toxic substances that is a carcinogen, as defined in this regulation, shall be included in the registration if the concentration of that substance is at least 0.1% of the mixture.

D. Other Permit Conditions

- 1. 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.

2. 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.
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.

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