

22 November 2006

Ms. Kathryn Hinckley
Environmental Health and Safety Manager
Stanley Fastening Systems, L.P.
2 Briggs Drive
East Greenwich, RI 02818-9949

Dear Ms. Hinckley:

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 at 2 Briggs Drive, East Greenwich, RI.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval Nos. 1925-1949).

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: East Greenwich Building Official

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

MINOR SOURCE PERMIT

STANLEY FASTENING SYSTEMS, L.P.

APPROVAL NOs. 1925-1949

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

Stanley Fastening Systems, L.P.

For the following:

Installation of 25 nail coating machines. The nail coating machines shall be either stick

collating or coil welding machines.

Located at: *2 Briggs Drive, East Greenwich*

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 *Stanley Fastening Systems, L.P.* 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

Stanley Fastening Systems, L.P.

Approval Nos. 1925-1949

A. Emission Limitations

1. Volatile Organic Compounds (VOC)

- a. The VOC content of all coatings used on the nail coating machines shall not exceed 3.0 pounds of VOC per gallon of coating (minus water and exempt compounds).
- b. The total, combined quantity of VOC emissions from the twenty-five nail coating machines, including thinners, additives and cleaners, shall not exceed 1,040 lbs per month (12-month rolling average).

2. Hazardous Air Pollutants (HAP)

- a. The HAP content of all coatings used on the nail coating machines shall not exceed 2.6 lbs of HAP per gallon of coating solids.
- b. Each thinner and/or other additive and cleaning material used on the nail coating machines shall contain no organic HAP.

3. Listed Toxic Air Contaminant

- a. The total quantity of ammonia emissions discharged to the atmosphere from the twenty-five nail coating machines shall not exceed:

(1) 0.36 pounds per hour; and,

(2) 3,164 pounds in any consecutive 12-month period.

The Office of Air Resources may revise conditions A.3.a.(1) and (2), if, after completion of the review of the facility's Air Toxics Operating Permit application, it is determined that the emission

limitations must be revised to ensure compliance with Air Pollution Control Regulation No. 22.

B. Compliance Demonstration

1. Compliance with the coating emission limitation contained in Condition A.1 of this permit shall be demonstrated in accordance with 40 CFR 60, Appendix A, Methods 24, 24A as amended or any other USEPA approved method which has been accepted by the Director. A one-hour bake time shall be used for Methods 24 and 24A, which apply to multi-component coatings.
2. Compliance with the emission limitations contained in Conditions A.2.a and b of this permit shall be demonstrated using the procedures in 40 CFR 63.3941.

C. Recordkeeping and Reporting Requirements

1. The owner/operator shall collect, record and maintain the following information each month for each nail coating machine:
 - a. The name, identification number and amount of each coating used, as applied, on each nail coating machine; and,
 - b. The mass of VOC per volume of the coating (excluding water and exempt compounds), as applied, used each month on each nail coating machine; and,
 - c. The mass of HAP per volume of coating solids, as applied, used each month on each nail coating machine; and,
 - d. The mass of any listed toxic air contaminant per volume of the coating, as applied, used each month on each nail coating machine; 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 10 business days after the first of the month, determine the total, combined quantity of VOC emissions from the twenty-five nail coating machines, including thinners, additives and cleaners. 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, combined quantity of VOC emissions from the twenty-five nail coating machines, including thinners, additives and cleaners exceeds 1,040 lbs per month (12-month rolling average).
4. The owner/operator shall, on a monthly basis, no later than 10 business days after the first of the month, determine the total quantity of ammonia discharged to the atmosphere from the twenty-five nail coating machines. 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 ammonia discharged to the atmosphere from the twenty-five nail coating machines exceeds:
 - a. 0.36 pounds per hour; or,
 - b. 3,164 pounds in any consecutive 12-month period.
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 the date of actual start-up of each of the nail coating machines no later than 15 days after such date.
8. The owner/operator, before changing the method of compliance from complying coatings to daily-weighted averaging or control devices, shall submit a Compliance Certification Plan to the Office of Air Resources for review and approval. Such plan shall include:
 - a. The name and location of the facility
 - b. The name, address and telephone number of the person responsible for the facility.
 - c. The name and identification number of the emission units which will comply by means of daily-weighted averaging or control devices.
 - d. For daily-weighted averaging:
 - (1) The instrument or method by which the owner/operator will accurately measure or calculate the volume of each coating (excluding water), as applied, used each day on

each emission unit.

- (2) The method by which the owner/operator will create and maintain records each day as required by Subsection 19.5.2(c) of APC Regulation No. 19.
- (3) The time at which the facility's day begins if a time other than midnight local time is used to define a day.

e. For control devices:

- (1) The name and identification number of each coating, as applied, on each coating line or operation.
- (2) The mass of VOC per volume coating solids applied and the gallons of solids of each coating applied.
- (3) Identification of each control device which will be or has been installed and date of installation.
- (4) Identification of coating lines which will be controlled by each control device and documentation of expected capture and destruction efficiency or reduction efficiency.
- (5) Control device design information;
 - (a) For thermal incinerators - the design combustion temperature ($^{\circ}\text{F}$).
 - (b) For catalytic incinerators - design exhaust gas temperature ($^{\circ}\text{F}$), design temperature rise across catalyst bed ($^{\circ}\text{F}$), anticipated frequency of catalyst change, and catalyst changes.
 - (c) For condensers - design inlet temperature of cooling medium ($^{\circ}\text{F}$), design exhaust gas temperature ($^{\circ}\text{F}$).
 - (d) For carbon adsorbers - design pressure drop across the adsorber, VOC concentration at breakthrough.

f. Information describing the effect of the change on the emissions of any air contaminant.

g. A demonstration that emissions from the stationary source will not cause an increase in the ground level ambient concentration at or

beyond the property line in excess of that allowed by APC Regulation No. 22.

9. Deviations from permit conditions shall be reported, in writing, within (5) business days of the deviation, to the Office of Air Resources. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.
10. The owner/operator shall notify the Office of Air Resources in writing of any planned physical or operational change to any equipment covered under this approval 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.

Any such change shall be consistent with the appropriate regulation and have the prior approval of the Director.

11. 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. 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. The facility is subject to the requirements of 40 CFR 63.1-15, Subpart A, "General Provisions" (as indicated in Table 2 to Subpart M MMM of 40 CFR 63) and 40 CFR 63, Subpart M MMM, National Emission Standards for

Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products. Compliance with all applicable provisions therein is required, unless otherwise stated in this permit.

3. Employees of the Office of Air Resources and its authorized representatives shall be allowed to enter the facility at all 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.
4. 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.
5. The emission and dispersion characteristics of all sources of any listed toxic air contaminant at the facility shall be consistent with the parameters used in the air quality modeling to demonstrate that the emissions do not cause an impact, at or beyond the property line of the facility, which exceeds the Acceptable Ambient Level for that substance. The Office of Air Resources, in its sole discretion, may reopen this minor source permit if it determines that the emission and dispersion characteristics have changed significantly and that emission limitations must be revised and/or added to this permit to ensure compliance with Air Pollution Control Regulation No. 22.

PCMIN-STANLEYFS 06