

11 September 2006

Mr. Michael J. Conway
Environmental Health and Safety Manager
Toray Plastics (America), Inc.
50 Belver Avenue
North Kingstown, RI 02852

Dear Mr. Conway:

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 50 Belver Avenue, North Kingstown, RI.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval Nos. 1908-1909).

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

TORAY PLASTICS (AMERICA), INC.

APPROVAL NOs. 1908-1909

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:

Installation of two gravure surface coaters on the A4 and A5 film lines in the Torayfan Division.

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. 1908-1909

A. Emission Limitations

1. Volatile Organic Compounds (VOC)

- a. The VOC content of all coatings used in polypropylene film coating operations on film lines A4 and A5 shall not exceed 2.9 pounds of VOC per gallon of coating (minus water and exempt compounds).
- b. The total quantity of VOC emissions discharged to the atmosphere from all operations conducted for the entire facility shall not exceed 8,167 pounds of VOC per calendar month based upon a 12-month rolling average.

2. Listed Toxic Air Contaminant

- a. The total quantity of isopropanol emissions discharged to the atmosphere from polypropylene film coating operations on film lines A4 and A5 shall not exceed 3.19 pounds per hour.

B. Operating Requirements

- 1. The gravure coaters on the A4 and A5 film lines shall perform single-sided coating operations only.

C. Compliance Demonstration and Testing

1. VOC Content of Coatings Formulated On-Site

- a. For a 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 the 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 Coating As-Supplied
 - a. For a 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 the coating.
 - 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.

D. Record Keeping and Reporting

1. The owner/operator shall collect and record all of the following information each month for film lines A4 and A5:
 - a. The name, identification number and amount of the coating used, as applied, on each film line; and,

- b. The mass of VOC per volume of the coating (excluding water and exempt compounds), as applied, used each month on each film line; and,
 - c. The mass of any listed toxic air contaminant per volume of the coating, as applied, used each month on each film line.
 - d. The type and amount of solvent used for diluents and cleanup operations.
2. The owner/operator shall, on a daily basis, determine the total quantity of isopropanol discharged to the atmosphere from polypropylene film coating operations on film lines A4 and A5. 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 within 24 hours, whenever the total quantity of isopropanol discharged to the atmosphere from polypropylene film coating operations on film lines A4 and A5 exceeds 3.19 pounds per hour.
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 VOC discharged to the atmosphere from the entire facility. 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 VOC discharged to the atmosphere, based upon a 12-month rolling average, from all operations at this facility, exceeds 8167 pounds per month.
6. 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.
7. The owner/operator shall notify the Office of Air Resources, in writing, of the date of actual initial start-up of the equipment covered by this permit no later than 15 days after such date.

8. 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.
9. Deviations from permit conditions, including those attributable to upset conditions as defined in this permit, 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 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.
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. 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.
4. The emission and dispersion characteristics of all sources of isopropanol at the facility shall be consistent with the parameters used in the air quality modeling to demonstrate that the emissions of isopropanol 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.

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