

13 January 2004

Mr. Michael W. Riessen, President
B & D Plastics, Incorporated
807 Hartford Avenue
Johnston, RI 02919

Dear Mr. Riessen:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for the installation of process equipment at your 807 Hartford Avenue, Johnston facility.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval No. 1784).

I can be reached at 222-2808, x-7011 if there are any questions concerning this permit.

Sincerely,

Douglas L. McVay
Associate Supervising Engineer
Office of Air Resources

cc: Johnston Building Official

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

MINOR SOURCE PERMIT

B & D PLASTICS, INCORPORATED

APPROVAL NO. 1784

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

B & D Plastics, Incorporated

For the following:

The installation of an 8-color flexographic printing press (Approval No. 1784).

Located at: *807 Hartford Avenue, Johnston*

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 *B & D Plastics, 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

B & D PLASTICS, INCORPORATED

APPROVAL NO. 1784

A. Emission Limitations

1. The total quantity of volatile organic compound emissions discharged to the atmosphere from the facility shall not exceed 98,000 pounds in any given consecutive 12-month period.

B. Design/Operating Requirements

1. The flexographic printing press shall be equipped with enclosed doctor blade chambers.
2. All containers used to store VOC-containing materials must be equipped with a tight fitting lid which is kept closed when the container is not in use so as to minimize VOC emissions to the atmosphere.

C. Record Keeping and Reporting

1. The owner/operator shall collect and record all of the following information each month for the flexographic printing press:
 - a. The name, identification number and amount of each ink, as applied; and,
 - b. The mass of VOC per volume of each ink (excluding water and exempt compounds), as applied; and,
 - c. 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 the facility for that month and the previous 12-month period. All purchase orders, invoices, and other documents to support the determination of actual volatile organic compound emissions shall be maintained and be made available to the Office of Air Resources upon request.

3. The owner/operator shall notify the Office of Air Resources in writing within 30 days, whenever the quantity of volatile organic compounds emitted from the entire facility for any 12-month period exceeds 98,000 pounds.
4. The owner/operator shall notify the Office of Air Resources in writing of the date of actual start-up of the flexographic printing press, no later than 15 days after such date.
5. The owner/operator shall notify the Office of Air Resources in writing of any 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.

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

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 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.
8. 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 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 existing CMF Beta Stack Printing Press (Approval No. 1030) shall be removed from service and rendered inoperable within 90 days of the startup of the new 8-color flexographic printing press.
- 5. If the emission limitations set forth in Condition A.1 are exceeded, the owner/operator shall immediately be in compliance with all applicable requirements in APC Regulation No. 21, "Control of Volatile Organic Compound Emissions from Printing Operations". Failure to comply with APC Regulation No. 21 shall subject the permittee to enforcement action, which may include monetary penalties.