

5 May 2016

Mr. Eric Dodge
Plant Manager
The Okonite Company
5 Industrial Drive
Cumberland, RI 02864

Dear Mr. Dodge:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your request for a minor source permit for process equipment at your 5 Industrial Drive, Cumberland, Rhode Island location.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval No. 2322).

If there are any questions concerning this permit, please contact me at 401-222-2808, extension 7177 or at kasandra.mckenzie@dem.ri.gov.

Sincerely,

Kasandra McKenzie, EIT
Air Quality Specialist
Office of Air Resources

cc: Cumberland Building Official
Richard Hittinger, President - Alliance Environmental Group, Inc.

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

MINOR SOURCE PERMIT

THE OKONITE COMPANY

APPROVAL NO. 2322

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

The Okonite Company

For the following:

Installation of process and ancillary equipment for the manufacturing of electrical and thermocouple cable and insulated wire.

Located at: *5 Industrial Drive, Cumberland, RI*

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 *The Okonite Company* 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.

**Douglas L. McVay, 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

THE OKONITE COMPANY

APPROVAL NO. 2322

A. Emission Limitations

1. Volatile Organic Compound (VOC) Emission Limitations

- a. The total quantity of VOC 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.
- c. The total quantity of VOC emissions discharged to the atmosphere from the entire facility shall not exceed 3,333 pounds of VOC per calendar month based upon a 12-month rolling average.

2. Hazardous Air Pollutant (HAP) Emission Limitations

The total quantity of HAP emissions discharged to the atmosphere from all operations shall not exceed 833 pounds of any one HAP or 1,666 pounds of any combination of HAPs per calendar month based upon a 12-month rolling average. HAP shall mean an air pollutant which has been listed pursuant to Section 112(b) of the Clean Air Act Amendments of 1990.

3. Listed Toxic Air Contaminants Emission Limitations

The total quantity of emissions discharged to the atmosphere from the entire facility, of any listed toxic air contaminant shall not exceed the minimum quantity for that contaminant as specified in Appendix A of Air Pollution Control Regulation No. 9, based upon a 12-month rolling average. Emissions from activities exempted from the provisions of APC Regulation No. 22 in subsection 22.2.2 are not included in this limitation.

4. Odors

Any air contaminant or combination of air contaminants discharged to the atmosphere from the facility shall not create an objectionable odor beyond the

property line of this facility. Odor evaluations shall be conducted according to the provisions of Air Pollution Control Regulation No. 17.

B. Operating Requirements

1. 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.
2. All extrusion heads shall be operated in accordance with manufacturer's specifications and all necessary precautions must be taken to assure that temperatures are controlled to avoid thermal breakdown of extruded materials.
3. The total quantity of plastic extruded from all extrusion heads shall not exceed 23,625 tons of plastics in any consecutive 12-month period.
4. The total quantity of Sioplas compounds cured in the curing chambers shall not exceed 3,300,000 pounds in any consecutive 12-month period.

C. Record Keeping and Reporting

1. For the lacquer application, 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 of each coating used (excluding water and exempt compounds), as applied; 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. For printing operations, the owner/operator shall collect and record all of the following information each month:
 - a. The name, identification number and amount of each ink, as applied; and,
 - b. The mass of VOC and/or HAP per volume of each ink used (excluding water and exempt compounds), as applied; 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.

3. For each curing chamber, the owner/operator shall collect and record all of the following information each month:
 - a. The name, identification number and mass of each Sioplas compound processed, as fed.
4. For each extruder, the owner/operator shall collect and record all of the following information each month:
 - a. The name, identification number and mass of each thermoplastic compound processed, as fed.
5. The owner/operator shall keep and maintain records sufficient to determine actual volatile organic compound emissions, hazardous air pollutant emissions and listed toxic air contaminant emissions for the entire facility. All purchase orders, invoices, emission factors, calculation procedures and other documentation to support the determination of actual volatile organic compound emissions, hazardous air pollutant emissions and listed toxic air contaminant emissions shall be maintained and be made available to the Office of Air Resources upon request.
6. The owner/operator shall, on a monthly basis, no later than 15 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.
7. The owner/operator shall notify the Office of Air Resources in writing within 15 days of determining that the total quantity of VOC emissions discharged to the atmosphere from all surface coating operations exceeds 1,666 pounds in any one calendar month.
8. The owner/operator shall, on a monthly basis, no later than 15 days after the first of the month, determine the total quantity of VOC discharged to the atmosphere from all operations at the entire facility. Monthly and 12-month rolling averages shall be calculated. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.
9. The owner/operator shall notify the Office of Air Resources in writing, within 15 days of determining that the total quantity of VOCs discharged to the atmosphere from all operations at the facility exceeds 3,333 pounds per calendar month (12-month rolling average).
10. The owner/operator shall, on a monthly basis, no later than 15 days after the first of the month, determine the total quantity of HAP emissions discharged to the atmosphere from the entire facility. Monthly and 12-month rolling averages shall be calculated. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.

11. The owner/operator shall notify the Office of Air Resources in writing, within 15 days of determining that the total quantity of HAP emissions discharged to the atmosphere from all operations for the entire facility exceeds 833 pounds of any one HAP or 1,666 pounds of any combination of HAPs per calendar month based upon a 12-month rolling average.
12. The owner/operator shall, on a monthly basis, no later than 15 days after the first of the month, determine the total quantity of each listed toxic air contaminant in Appendix A of the Air Pollution Control Regulation No. 9 discharged to the atmosphere from the entire facility. Monthly and 12-month rolling averages shall be calculated. The 12-month rolling average shall be used for comparison with emission limitations. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.
13. The owner/operator shall notify the Office of Air Resources in writing, within 15 days of determining that the total quantity of emissions discharged to the atmosphere from the entire facility, of any listed toxic air contaminant exceeds the minimum quantity for that contaminant as specified in Appendix A of Air Pollution Control Regulation No. 9.
14. The owner/operator shall, on a monthly basis, no later than 15 days after the first of the month, determine the total quantity, in pounds, of all Sioplas compounds used in the curing chambers. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.
15. The owner/operator shall notify the Office of Air Resources in writing within 15 days of determining that the total quantity of Sioplas compounds used in the curing chambers exceeds 3,300,000 pounds per year based upon a 12-month rolling total.
16. The owner/operator shall, on a monthly basis, no later than 15 days after the first of the month, determine the total quantity of plastic used in all extruders. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.
17. The owner/operator shall notify the Office of Air Resources in writing within 15 days of determining that the total quantity of plastic used in the extruders exceeds 23,625 tons per year based upon a 12-month rolling total.
18. 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 fifteen days after such date.
19. 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.

20. 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.

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

21. 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.
22. 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 time 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 malfunctions, 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. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this permit have been achieved. 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. This permit contains emission limitations and recordkeeping and reporting requirements relating to Volatile Organic Compounds (VOCs). A VOC is defined in the Office of Air Resources' General Definitions Regulation. Any organic compound not excluded from the definition is considered a VOC under this permit.