



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



ATTACHMENT # 1

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| STATE OF CONNECTICUT |) | |
| DEPT. OF ENVIRONMENTAL PROTECTION |) | |
| |) | <u>STATE ORDER NO. 8001</u> |
| VS. |) | |
| |) | Proposed; March 17, 1987 |
| FRISMAR, INC. |) | Final Order October 6, 1987 |
| CLINTON, CONNECTICUT |) | |

IN THE MATTER OF STATE ORDER NO. 8001

WHEREAS, Frismar, Inc. (hereinafter, the "Company") One Heritage Park Road, Clinton, Connecticut operates surface coating equipment subject to the standards and limitations of the Administrative Regulations for the Abatement of Air Pollution (hereinafter, "Regulations"); and

WHEREAS, the Commissioner of the Department of Environmental Protection (hereinafter "Commissioner") issued State Order No. 775A to the Company requiring compliance to be achieved with Sec. 22a-174-20(q) of the Administrative Regulations for the Abatement of Air Pollution (hereinafter "Regulations") concerning Volatile Organic Compound (VOC) Emissions from Paper Coating Operations. The State Order specifically concerned the Company achieving compliance through the submission of an approved Alternative Emission Reduction Plan pursuant to Section 22a-174-20(cc); and

WHEREAS, Sec. 22a-174-20(q) requires that coating materials contain no greater than 2.9 pounds of Volatile Organic Compounds per gallon of coating material, as applied, but that in lieu of compliance on a per coating basis a source may propose compliance pursuant to Sec. 22a-174-20(cc) which permits alternative emission reductions consisting of equal or greater emission reductions that would otherwise be obtained through compliance with the prescribed emission limitation; and

WHEREAS, State Order No. 775A addressed VOC emissions from the Company's two paper coating machines, a KCA dryer (coater #1) and an AER-Overly dryer (coater #2); and

WHEREAS, the Company has completed installation of an inert atmosphere solvent recovery system for coater #2 (the AER-Overly dryer), completed material balance calculations and has demonstrated compliance with the terms and conditions of Section 22a-174-20(q) and Section 22a-174-20(bb); and

Phone:

165 Capitol Avenue • Hartford, Connecticut 06106

An Equal Opportunity Employer

WHEREAS, the Company has completed certain modifications concerning the operation of coater #1, has submitted documentation concerning the cost of compliance with Sec. 22a-174-20(q) and has proposed that a determination be made which supports that Alternative RACT has been achieved; and

WHEREAS, Air Compliance Unit staff members and EPA representatives have completed review of the Company's Alternative RACT proposal and have determined that compliance with the specific requirements of Sec. 22a-174-20(q) cannot be achieved for coater #1 on the grounds that compliance is not technically or economically feasible subject to the specific conditions and limitations represented by this order; and

WHEREAS, the Company consents to the entry of an order of the Commissioner pursuant to Sec. 22a-174-12 and as required by Sec. 22a-174-20(cc)(2) will adhere to the terms and conditions of the Alternative RACT approval as specified by this document, the compliance timetable and the submissions by the Company specifically referenced within this order and further acknowledges required approval by the United States Environmental Protection Agency as a revision to Connecticut's State Implementation Plan.

NOW, THEREFORE, by authority of Sec. 22a-178 et. seq. of the Connecticut General Statutes and Section 110(a) of the Clean Air Act, as amended 42 U.S.C. Sec. 7410(a), the Commissioner hereby approves the subject compliance proposal and orders Frismar, Inc. to commence full and continued operation of its coating operations in accordance with the terms of the Alternative RACT proposal approved and described by the following and specifically delineated by the Compliance Timetable which is hereby incorporated by reference to this order.

1. Those portions of the Alternative Emission Reduction Plan as initially submitted on December 27, 1984 and periodically updated, as required, to reflect changes in State and Federal policy concerning the approvability of Alternate RACT determinations. Correspondence dated June 10, 1986 concerns specific limitations and demonstrations relative to coater #1.

2. For the continued operation of coater #2 (AER-Overly Dryer) the following operating conditions must be adhered to:

- a. maintenance of the inert atmosphere solvent recovery system sufficient to achieve a minimum ninety-three percent (93%) overall reduction level for VOC's as well as the additional operating conditions noted by the Compliance Timetable.
- b. Complete all recordkeeping, testing and reporting requirements of the Compliance Timetable.

3. For the operation of coater #1, maintain those operating conditions upon which the Alternate RACT determination was based including, but not limited to, the following (reference Compliance Timetable for a complete listing of all requirements);

- a. Maintain compliance with the daily and monthly VOC limitations specified
- b. Maintain formulation calculation sheets, RACT coating levels, production rates and any other information required by the compliance timetable.

It is acknowledged that failure to demonstrate continued compliance with the proposals and requirements of the paragraphs listed above as well as demonstrating compliance with the terms and conditions set forth in the Compliance Timetable which is hereby incorporated by reference in this Order shall constitute a violation of the Regulations of this Department and shall subject the Company to further enforcement action including but not limited to liability for civil penalty assessments up to \$25,000 plus \$1,000 per day pursuant to Section 22a-6b(a)(3) of the Connecticut General Statutes and Section 22a-6b-603 of the Department's Regulations.


Questions concerning the terms of this Order should be addressed to David A. Nash, Enforcement Section, Air Compliance Unit. Any future correspondence should make reference to this State Order.

Frismar, Inc.
Clinton, Connecticut

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State Order No. 8001
October 6, 1987

Entered as a final decision of the Commissioner of
Environmental Protection this 19 day of Oct. 1987.



Leslie Carothers
Commissioner
Dept. of Environmental Protection

As a duly authorized representative of Frismar Inc., I
hereby consent to the terms and conditions of this order and do
hereby waive the right to appeal this order pursuant to Section
22a-174-12 (b)(4) of the Regulations this 20th day of
October 1987

Frismar, Inc.

By:  _____

Title: GENERAL MANAGER

LC

Enc.

COMPLIANCE TIMETABLE

TYPE OF SOURCE: MAJOR MINOR PROCEDURAL OTHER _____

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| PRIME CONTACT: Ken Stalter | SOURCE NAME: Frismar, Inc. |
| TITLE OF CONTACT PERSON: General Manager | |
| SOURCE ADDRESS: One Heritage Park Road Clinton, Connecticut 06413 | PREMISE NO.: 037-020 CLIENT NO.: 000813 |
| | ORDER NO.: 8001 DATE ISSUED: 10/6/87 |
| | N.V. NO.: 90313 DATE ISSUED: 12/31/85 |
| TELEPHONE NO.: 669-0358 | EQUIPMENT TYPE: Roll Coaters 1 & 2 |
| VIOLATION SUBSECTION: 22a-174-20(q), 20(cc) | REG. NO.: P-137-007,008 INSPECTOR AND NO.: DN-56 |

| STEP | EVENTS LEADING TO COMPLIANCE | TIMETABLE | COMPLETED | VER. |
|------|--|-----------|-----------|------|
| | <p style="text-align: center;">Alternative Emission Reduction Plan Pursuant to Section 22a-174-20 (cc)</p> <p>Frismar, Inc. shall operate its surface coating equipment, Coater #1 (KCA Dryer) and Coater #2 (AER-Overly Dryer) in the manner described by State Order No. 8001 and this Compliance Timetable. Coater #2 has demonstrated compliance with Sec. 22a-174-20(q) through installation of a solvent recovery system. This approval of Frismar's Alternative Reasonably Available Control Technology (RACT) determination is subject to the conditions of this timetable noting the operation of coater #1 subject to operating limitations restricting Volatile Organic Compound Emissions (VOC) on a daily, monthly, and annual basis.</p> <p>The following conditions apply to the operation of the Frismar's surface coating equipment until such time as this order may be amended or otherwise altered in a manner approved by the Commissioner of Environmental Protection. These conditions apply to the operation of coater #1 and coater #2 immediately upon the effective date of State Order 8001.</p> <p>1. The terms and conditions of this plan shall be in effect at all times that the subject equipment is in operation. The averaging period for the daily emission limit commences with the first Monday following the effective date of this order. The monthly averaging period shall commence with the first day of the first month following the effective date of this order. The annual recordkeeping provisions shall correspond to that period of time represented by June 1 through May 31.</p> | | | |

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| COMPLIANCE TIMETABLE |
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| SOURCE NAME: Frismar, Inc. | PREMISE NO.: 037-020 | CLIENT NO.: 000813 |
| VIOLATION SUBSECTION: 22a-174-20(q), 20(cc) | ORDER NO.: 8001 | DATE ISSUED: 10/6/87 |

| STEP | EVENTS LEADING TO COMPLIANCE | TIMETABLE | COMPLETED | VER. |
|------|--|-----------|-----------|------|
| 2. | <p>(a) Coater #2 has demonstrated full compliance with Sec. 22a-174-20 (q) and must operate only with the Inert-Atmosphere Solvent Recovery System fully functional and demonstrating a minimum ninety-three percent (93%) total recovery efficiency as per the operating parameters noted during the material balance testing conducted on July 23, 24, 1985 and shall be operated in a manner sufficient to cause compliance with the applicable requirements of Section 22a-174-20(bb).</p> <p>(b) Maximum allowable emissions of VOC's for coater #2 shall be as follows:</p> <p style="margin-left: 40px;">Annual basis: 34.4 tons Monthly: 2.87 tons Daily: 286.47 lbs.</p> <p>The above are based upon operation of Coater #2 at 48 weeks per year, 5 days per week, 24 hours per day or the equivalent and at an 85% equipment utilization rate allowing for maintenance and downtime. Further, these emission rates correspond to a coating speed of 65 FPM, 3900 linear feet per hour. Maximum VOC emissions are 3.6 lbs./ream. (1 ream is equivalent to 3000 square feet).</p> <p>(c) Material balance testing shall be conducted on at least an annual basis in addition to regular maintenance of the solvent recovery system. This Department shall be notified twenty (20) days prior to the test date. The Department may require additional testing upon notification to Frismar. The duration of any individual material balance test shall not exceed twelve (12) hours of operation and shall not be conducted for any less than one hour in length.</p> <p>(d) Daily records must be maintained on the amount of VOC applied and amount of VOC recovered as a function of required control efficiency.</p> | | | |

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| COMPLIANCE TIMETABLE |
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| VIOLATION SUBSECTION: 22a-174-20(q), 20(cc) | ORDER NO.: 8001 | DATE ISSUED: 10/6/87 |

| STEP | EVENTS LEADING TO COMPLIANCE | TIMETABLE | COMPLETED | VER. |
|------|---|-----------|-----------|------|
| 3. | <p>Coater #1 is approved to operate subject to the following conditions.</p> <p>(a) Operation at maximum daily VOC emission rate of 918 lbs.</p> <p>(b) Operation at maximum monthly VOC emission rate of 2.833 tons (determined on the basis of either a monthly emission rate or the average of any two consecutive monthly periods i.e. a rolling average).</p> <p>(c) Operation at maximum annual VOC emission rate of 34 tons.</p> <p>(d) For the purposes of this order; "daily" shall be defined as that twenty-four (24) hour period from midnight to midnight; "monthly" shall be defined as a calendar month; "annual" shall be defined as June 1 through May 31.</p> <p>(e) Operation at a maximum continuous VOC emission rate of 5.32 pounds VOC/gallon of coating (minus water and photochemically nonreactive solvents) for all first-pass coatings and a maximum continuous VOC emission rate of 6.42 pounds VOC/gallon of coating (minus water and photochemically nonreactive solvents) for all second-pass coatings. Additionally, all second-pass coatings will be limited to an emission rate of 20 pounds of VOC/ream (3000 square feet) of material coated. (A first-pass coating is defined as any coating applied to an uncoated substrate either to produce a final product, or an intermediate product which will be further coated. A second-pass coating is defined as a coating applied to a previously-coated substrate to produce a final product). If Frismar replaces or reformulates any coatings used on coater #1, the new coating must emit no more VOC per gallon of coating than the coating it replaces.</p> | | | |

COMPLIANCE TIMETABLE

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| FIRM NAME: Frismar, Inc. ON SUBSECTION: 22a-174-20(q), 20(cc) | PREMISE NO.: 037-020 ORDER NO.: 8001 | CLIENT NO.: 000813 DATE ISSUED: 10/6/87 |
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| EVENTS LEADING TO COMPLIANCE | TIMETABLE | COMPLETED | VER. |
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| <p>If at any time Frismar installs control equipment Frismar shall operate at a maximum continuous VOC emission rate of the more stringent of a) the solids-applied equivalent of 2.9 pounds VOC/gallon of coating (minus water and photochemically non-reactive solvents) <u>or</u> b) that emission rate which would result from ninety percent (90%) capture efficiency and ninety percent (90%) incinerator destruction efficiency upon start-up of that control equipment.</p> | | | |
| <p>(f) Specific records noting compliance with the terms and conditions of 3(a) thru 3(e) above shall be maintained at all times and available for inspection and review upon request.</p> | | | |
| <p>Specific required recordkeeping forms are noted as Frismar's submissions titled "monthly VOC Emissions" (providing weekly subtotal and running total by month for annual calculation) and "Weekly Report-Daily VOC Cap" providing daily VOC emissions by order and formula.</p> | | | |
| <p>(g) A master list of all coatings shall be maintained and submitted upon request. Any changes in VOC content, coverage rates and added VOC shall be noted in the master list upon occurrence and reported to the Department annually in the form of a completed updated master list. Any increase in the VOC content of any coating shall be reported to the Department within 10 days after occurrence. In addition to the records and reports noted by this Order, nonsubstantive changes to the Alternative Emission Reduction Plan shall be reported by June 1, 1988 and on a yearly basis from that time on. In no event shall any change result in an exceedance of any allowable emission limit.</p> | | | |