STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
AIR POLLUTION CONTROL COMMISSION

In the matter of administrative proceedings involving **VCF FILMS, INC.**, a corporation organized under the laws of the State of Delaware and doing business at 1100 Sutton Avenue, City of Howell, County of Livingston, State of Michigan.	SIP No. 3-1993

STIPULATION FOR ENTRY OF CONSENT ORDER
AND
FINAL ORDER FOR VOLATILE ORGANIC COMPOUND EMISSIONS

This proceeding results from provisions of the Federal Clean Air Act ("CAA"), 42 U.S.C. Section 7401 et seq., as amended by the Clean Air Act Amendments of 1990, P.L. No. 101-549, 104 Stat. 2399 (Nov. 15, 1990), that designate Livingston County as "moderate" non-attainment for ozone and require a State Implementation Plan ("SIP") that provides for the implementation of Reasonably Available Control Technology (RACT) with respect to all major sources of volatile organic compounds (VOCs) that are located in the non-attainment area.

The VCF Films, Inc. ("Company") owns and operates VCF Films, Inc. ("Plant"), which is a plant that manufactures plastic films, located at 1100 Sutton Avenue, City of Howell, County of Livingston, State of Michigan. The Michigan Department of Natural Resources ("MDNR") alleges that the Plant is a major source of VOC emissions which is subject to the RACT requirements of the Federal CAA.

The Company and the MDNR stipulate as follows:

1. The Chief of the Air Quality Division of the MDNR is authorized by general resolution of the Air Pollution Control Commission ("Commission") as the agent of the Commission to enter into this Final Order by Consent.

2. The MDNR is charged with the investigation and enforcement of all orders, regulations, rules, standards, and statutes of the State of Michigan concerning the emission and control of air contaminants.

3. The termination of this matter by a Final Order to be entered as a Consent order is proper and acceptable.

4. This Consent Order does not arise from an enforcement action of the MDNR. Further, the signing of this stipulation does not constitute an admission by the Company that the law has been violated. Rather, this Consent Order is designed to address the requirements of Section 182(b)(2)(C) of the Federal CAA pertaining to the application of RACT.

COMPLIANCE PROGRAM IMPLEMENTATION SCHEDULE

5. A. Permits

(1) By March 16, 1993, the Company shall install the equipment modifications to the existing carbon absorption system controlling emissions from the polyvinyl chloride (PVC) film casting process, as described in Permit to Install No. 244-92, approved on July 16, 1992.

(2) By April 15, 1993, the Company shall request, in writing, to Chief, Permit Unit, Air Quality Division, to void Permit No. 949-89.

B. Emission Limitations

(1) The volatile organic compound (VOC) emission rate from the PVC film casting process consisting of storage, mixing, casting, and drying operations (hereinafter, "process") shall not exceed 60.5 pounds per hour nor 153 tons per year. This limit includes fugitive and carbon adsorber tailstack emissions.

(2) The VOC emission rate from the portion of the process ducted to the carbon adsorption system shall not exceed 150 parts per million by volume at the carbon bed outlet to the ambient air, nor 33.6 pounds per hour.

RECORDKEEPING

6. A. The Company shall calculate the actual VOC emission rate from the process, including both fugitive and carbon adsorber tailstack emissions, on an hourly and yearly basis, by determining monthly solvent losses to atmosphere using records of solvent usage and recovery rates and the number of hours the process is operated during the month. The hourly VOC emission rate shall be determined by dividing the monthly solvent losses to atmosphere by the number of process operating hours per month. The yearly VOC emission rate shall be determined by summing the monthly solvent losses over a calendar year. All solvent usage and recovery data, operating hours, and emissions calculations shall be kept for a period of at least two years and made available to the Air Quality Division upon request.

MONITORING

7. A. The Company shall equip and maintain the carbon adsorption system with a continuous VOC monitor to detect breakthrough of the carbon beds. The VOC concentration constituting breakthrough shall be 150 parts per million volume at the carbon bed outlet to the ambient air.

B. Within 180 days after commencement of trial operation of the equipment modifications covered under approved Permit to Install No. 244-92, the Company shall submit to the Air Quality Division, for approval, a protocol for proper calibration and operation of the continuous VOC monitor used to detect breakthrough of the carbon beds. This protocol shall be based upon Method 25A and Method 25B.

GENERAL PROVISIONS

8. Upon entry, this Consent Order, along with other supporting documentation required by the EPA, shall be submitted to the EPA for approval as a revision to the Michigan SIP in accordance with Section 182 of the Federal Clean Air Act.

9. The company acknowledges that pursuant to Section 120 of the Federal Clean Air Act, PL 95-95, as amended, the Company may be required to pay a noncompliance penalty for failure to comply with this Order.

10. The Company and Staff do not regard this abatement program as a variance subject to the 12 month limitation specified in Section 22 of the Air Pollution Act, being MCLA 336.32.

11. The provisions of this order shall be binding on the parties to this action, their officers, servants, employees, and attorneys, and on those persons in active concert or participation with them who receive actual notice to this order. In the event VCF Films, Inc. sells or transfers the facility located at 1100 Sutton Avenue, Howell, it shall advise any purchaser or transferee of the existence of this order in connection with such sale or transfer. Within 30 calendar days, VCF Films, Inc. shall also notify Staff, in writing of such sale or transfer, the identity and address of any purchaser or transferee, and confirm the fact that notice of this order has been given to the purchaser or transferee.

12. Staff and the Company both acknowledge that a public hearing on this abatement program was held on March 16, 1993. Both Staff and the Company consent to enforcement of this Stipulation and Final Order in the same manner and by the same procedures for all final orders entered pursuant to Section 16 of 1965 PA 348, as amended, MCLA 336.26; MSA 14.58(16), including enforcement pursuant to the Michigan Environmental Protection Act ("MERA"), 1970 PA 127, MCLA 691.1201 et seq; MSA 14.528(201) et seq.

I, the undersigned, who is signing this Stipulation and Order for the Company, certify that I am fully authorized by the Company to enter into this Stipulation and Order and to execute and legally bind the Company to it.

Approved as to Form and Content:

VCF FILMS, INC.

Dated: 4-30-93

The above signatory subscribed and sworn to before me this 30th day of April, 1993.

KAY M. SMITH
NOTARY PUBLIC - LIVINGSTON CO., MICH.
MY COMMISSION EXPIRES 03-18-97

Notary Public

Approved as to Content:

ACTING

Dennis M. Drake, Acting Chief
AIR QUALITY DIVISION
DEPARTMENT OF NATURAL RESOURCES

Dated: 6/21/93

Approved as to Form:

A. Michael Leffler
Assistant Attorney General
DEPARTMENT OF ATTORNEY GENERAL

Dated: 5/26/93

FINAL ORDER

The Commission having had opportunity to review the above stated Stipulation for Entry of Consent Order, and this Commission having authorized the Chief of the Air Quality Division of the Department of Natural Resources as agent of the Commission to enter into consent orders,

IT IS ORDERED that this Consent Order is approved and shall be entered in the record of this Commission as a Final Order.

AIR POLLUTION CONTROL COMMISSION

By: Richard D Johns ACTING
Dennis M. Drake
Executive Secretary

Dated: 6/21/93