



**ENGINEERING DIVISION
PERMIT EVALUATION REPORT**

Applicant: Orcon Corporation

Application #: 10814

Plant #: 1675

1. Background:

Orcon Corporation has submitted an application for a Synthetic Minor Operating Permit. Currently, Orcon is operating under a Title V Major Facility Operating Permit, which is to expire on October 31, 2004. However, instead of renewing the Title V permit, Orcon has requested that it be granted a Synthetic Minor Operating Permit because it now qualifies for Synthetic Minor status. Over the past five years, Orcon has successfully developed low Volatile Organic Compound (VOC) aqueous adhesives for its products resulting in dramatically reduced VOC and Hazardous Air Pollutant (HAP) emissions. Orcon has declared that they will not return to the use of high VOC adhesives now or in future processes and products. Any proposed increase over the synthetic minor permit conditions would be subject to New Source Review and the Toxics Risk Management Policy, and either alteration or cancellation of the Synthetic Minor permit.

2. Emission Calculations:

Orcon Corporation has requested a Synthetic Minor Operating Permit. As a result, permit conditions will be added that restrict emissions of HAPs to below Title V levels. There is no increase of any criteria pollutant or HAP estimated as a result of this application. The following summarizes the maximum, annual emissions estimated from the facility's existing sources:

Source #	Source Description	Pollutant	Annual Emissions
1	Bocs B (#1) Machine Adh Appl		
2	NPCS # 1 Oven		
6	Bocs (#3) Machine Adh Appl		
7	BOCS #3 Oven		
11	Mix Room		
Combined S-1, S-2, S-6, S-7, & S-11	Combined S-1, S-2, S-6, S-7, & S-11	POC	24 TPY
Combined S-1, S-2, S-6, S-7, & S-11	Combined S-1, S-2, S-6, S-7, & S-11	NPOC	<50 TPY
Combined S-1, S-2, S-6, S-7, & S-11	Combined S-1, S-2, S-6, S-7, & S-11	HAP	1.35 TPY
12	Dry Adhesive Blending and Conveying System	PM10	< 1 TPY
13	Combined Printing Operation	POC	1.05 TPY
25	“BOCS” Adhesive Applicator D with Oven	POC	3.50 TPY
		HAP	0.175
26	Coating Dryer	POC	3.42 TPY
		HAP	0.65 TPY
Total		POC	32 TPY
		NPOC	< 50 TPY
		HAP	5 TPY

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3. Statement of Compliance:

The operations of Orcon Corporation are subject to and in compliance with Regulation 6, 8-4, 8-12, and 8-35.

Because there is no emission increase resulting from this application, Best Available Control Technology review and offset requirements are not triggered.

This facility is not located with 1000 feet of any school, and hence, public notice requirements are not triggered.

This facility is not subject to any NESHAP or NSPS requirements.

This facility is in compliance with the necessary requirements in Regulation 2, Rule 6 to obtain a modified synthetic minor permit. The facility has voluntarily accepted enforceable permit conditions including emission limits that will keep its annual emissions less than 50 tons per year of non-precursor organic compounds, 32 tons per year of any regulated air pollutant (not including non-precursor organic compounds), 1 ton of any hazardous air pollutant, and 5 tons of any combination of hazardous air pollutants. This revision to their existing permit will allow the facility to operate under a Synthetic Minor Operating Permit.

This synthetic minor operating permit covers all sources existing at this facility as of permit issuance. The sources are listed in Section 5 of this report.

4. Conditions

I recommend that Orcon's existing permit conditions (see attached) be archived and replaced with the following conditions. The following conditions are made up of existing conditions that have been reworded to reflect the "owner/operator" is responsible for meeting permit conditions and additional synthetic minor limits to restrict overall VOC and HAP emissions to below Title V levels.

Orcon Corporation, Plant # A1675, has a synthetic minor operating permit. This operating permit covers all sources at the facility.

The following conditions establish the federally enforceable permit terms that ensure this plant is classified as a Synthetic Minor Facility under District Regulation 2, Rule 6, Major Facility Review; and ensure it is not subject to the permitting requirements of Title V of the Federal Clean Air Act as amended in 1990, and 40 CFR Part 70. All applications submitted by the applicant and all modifications to the plant's equipment after issuance of the synthetic minor permit must be evaluated to ensure that the facility will not exceed the synthetic minor general limits below, and that sufficient monitoring, recordkeeping, and reporting requirements are imposed to ensure enforceability of the limits.

Any revision to a condition establishing this plant's status as a Synthetic Minor Facility or any new permit term that would limit emissions of a new or modified source for the purpose of maintaining the facility as a synthetic minor, must undergo the procedures set forth in Regulation 2, Rule 6, section 423. The basis for the synthetic minor conditions is an emission limit for less than 50 tons per year of non-precursor organic compounds, 32 tons per year of any other regulated air pollutant (not including non-precursor organic compounds), 1 ton of any hazardous air pollutant, and 5 tons of any combination of hazardous air pollutants.

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Synthetic Minor Conditions:

OVERALL EMISSIONS LIMIT:

1. The owner/operator shall not emit more than 1 ton of any single hazardous air pollutant (HAP) or 5 tons of any combination of HAPs in any consecutive 12-month period. (basis: Cumulative Increase; Synthetic Minor)
2. The owner/operator shall emit less than 50 tons of non-precursor organic compounds into the atmosphere during any consecutive 12-month period. (basis: Cumulative Increase; Synthetic Minor)
3. The owner/operator shall not emit more than 32 tons of any other regulated air pollutant into the atmosphere during any consecutive 12-month period. (basis: Cumulative Increase; Synthetic Minor)

S-1, S-2, S-6, and S-7:

4. The owner/operator shall not emit from S-1, S-2, S-6, and S-7 combined more than 100,000 pounds (50 tons) of non-precursor organic compounds per consecutive twelve-month period. (basis: Cumulative Increase)
5. The owner/operator shall not emit precursor organic compounds from S-1, S-2, S-6, and S-7 combined exceeding 220 pounds in any one-day or 48,000 pounds (24 tons) during any consecutive 12-month period. (basis: Cumulative Increase)
6. The owner/operator shall not emit more than 0.08 pound of volatile organic compounds (precursor and non-precursor organic compounds) per linear yard of product produced from S-1, S-2, S-6, and S-7 when averaged over a calendar quarter. (basis: Cumulative Increase)
7. The owner/operator shall maintain District-approved solvent usage logs that list the mass emissions of precursor and non-precursor organic compounds from each of S-1 and S-6 on a daily and year-to-date basis. The owner/operator shall group solvent emissions from ovens S-2 and S-7 with the emissions from the coaters associated with each such oven for the purpose of these records. The owner/operator shall summarize these logs on a quarterly basis and year-to-date basis. These logs shall be retained for at least five years and be available for review during normal business hours by the District's representatives. (basis: Cumulative Increase; Regulation 2-6-501)
8. In order to demonstrate compliance with parts 4 through 7 above, the owner/operator shall prepare a quarterly emissions report for of S-1, S-2, S-6, and S-7 to be submitted to the Director of Compliance and Enforcement within 30 days of the end of each quarter. These reports shall include the following:
 - a. Emissions of POC in lb/mon, lb/quarter, and year-to-date emissions;
 - b. Emissions of NPOC in lb/mon, lb/quarter, and year-to-date emissions;
 - c. Total yards of product produced for each BOCS line (S-1 and S-6) during the calendar quarter.
 - d. Emissions of VOC (POC and NPOC combined) in lb/yd of BOCS product averaged on a monthly basis;
and
 - e. Emissions of VOC (POC and NPOC combined) in lb/yd of BOCS product averaged over the calendar quarter;(basis: Cumulative Increase; Regulation 2-6-501)

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S-12:

9. The owner/operator shall not exceed 12 tons in any day of total throughput of material processed at S-12. (basis: Cumulative Increase)
10. The owner/operator shall abate S-12 with A-1 and A-2 dust collectors at all times during its operation. (basis: Cumulative Increase)
11. The owner/operator shall keep A-1 and A-2 in good operating condition at all times. (basis: Cumulative Increase)
12. The owner/operator shall not exceed Ringelmann 1.0 or result in fallout on adjacent property in such quantities as to cause a public nuisance per Regulation 1-301. (basis: Regulation 6-301)
13. The owner/operator shall maintain a daily record of the total weight of material processed at S-12 in a District approved log and retain these records for a period of at least five years from the date of entry. These logs shall be kept on site and made available to the District staff upon request. (basis: Cumulative Increase)
14. The owner/operator shall inspect the A-1 and A-2 dust collector a minimum of every five (5) days of operation to ensure proper operation. The following items shall be checked:
 - a. The dust collector exhaust shall be checked for evidence of particulate breakthrough. If breakthrough is evident from plume observations, or dust buildup near the stack outlet, the filter bags shall be checked for improper installation or any tears, holes, abrasions, and scuffs, and replaced as needed.
 - b. All hoppers shall be discharged in a timely manner.
 - c. The shaker cleaning system shall be maintained and inspected.(basis: Cumulative Increase; Regulation 2-6-501)
15. In order to demonstrate compliance with part 14, the owner/operator shall maintain all records of inspection and maintenance work including bag replacement for the baghouse in a District approved log. Records of each inspection shall consist of a log containing the date of inspection and the initials of the personnel that inspects the baghouses. These records shall be kept on site and made available for District inspection for a period of at least five years from the date on which a record is made. (basis: Cumulative Increase; Regulation 2-6-501)

S-13:

16. The owner/operator shall not emit more than 175 pounds per month or 2,100 pounds per year of precursor organic compound (POC) emissions from S13. (basis: Cumulative Increase; Regulation 8-20-110)
17. In order to demonstrate compliance with Part 16, the owner/operator shall maintain the following records in a District approved log for S-13. These records shall be kept on site and made available for District inspection for a period of five years from the date on which a record is made.
 - a. The type, VOC content, and amount of each ink used monthly.
 - b. Calculated POC emissions.
 - c. Monthly ink usage and POC emissions shall be totaled for each consecutive 12-month period.(basis: Cumulative Increase; Regulation 2-6-501)

S-25:

18. Usage of adhesive and coating and cleanup solvent at S25 shall not exceed the following limits, in any consecutive twelve-month period:
 - a. Comp. Urethane Adhesive, or
Sancure Waterborne Urethane 23,600 gallons
 - b. Cleanup Solvent 0 gallons(basis: Cumulative Increase, Toxic Risk Screen)

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19. The owner/operator may use coatings and cleanup solvents other than the materials specified in Part 18 and/or other quantities than those specified may be used at S-25, provided that the owner/operator can demonstrate that both of the following are satisfied:
- a. Total POC emissions from S25 do not exceed 7,001 pounds in any consecutive twelve month period; and
 - b. The use of these materials does not increase toxic emissions above any risk screening trigger level. (basis: Cumulative Increase, Toxic Risk Screen)
20. In order to demonstrate compliance with Parts 18 and 19, the owner/operator shall maintain the following records in a District approved log for S-25. Such records should be kept for a minimum of 5 years from the date of record and be made available for inspection upon request by the District.
- a. Type and monthly usage of all POC containing materials used;
 - b. If a material and/or quantity other than those specified in Part 18 are used, POC and toxic component contents of each material used; and mass emission calculations to demonstrate compliance with Part 19, on a monthly basis;
 - c. Monthly usage and/or calculated emissions shall be totaled for each consecutive twelve-month period. (basis: Cumulative Increase, Toxic Risk Screen, Regulation 2-6-501)

S-26:

21. The owner/operator shall not exceed the following usage limits of adhesive coating and cleanup solvents at S-26 in any consecutive twelve-month period:
- a. Orcon #OA-66 & equivalents and
Orcon # OA-1036 & equivalents 27,331 gallons total
(excluding water)
 - b. Cleanup Solvent 0 gallons
(basis: Cumulative Increase, Toxic Risk Screen)
22. The owner/operator may use coatings and cleanup solvents other than the materials specified in Part 21 and/or other quantities than those specified may be used at S-26, provided that the owner/operator can demonstrate that both of the following are satisfied:
- a. Total POC emissions from S26 do not exceed 6,833 pounds in any consecutive twelve month period; and
 - b. The use of these materials does not increase toxic emissions above any risk screening trigger level. (basis: Cumulative Increase, Toxic Risk Screen)
23. In order to demonstrate compliance with Parts 21 and 22, the following records shall be kept by the owner/operator of S-26. Such records should be kept for a minimum of 5 years from the date of record and be made available for inspection upon request by the District.
- a. Type and monthly usage of all POC containing materials used (excluding water);
 - b. If a material and/or quantity other than those specified in Part 21 are used, POC and toxic component contents of each material used; and mass emission calculations to demonstrate compliance with Part 22, on a monthly basis;
 - c. Monthly usage and/or calculated emissions shall be totaled for each consecutive twelve-month period. (basis: Cumulative Increase, Toxic Risk Screen, Regulation 2-6-501)
24. In order to demonstrate compliance with Parts 1 through 4 of this condition, the owner/operator of S-1, S-2, S-6, S-7, S-11, S-12, S-13, S-25, and S-26 shall prepare a biannual emissions report for S-1, S-2, S-6, S-7, S-11, S-12, S-13, S-25, and S-26 to be submitted to the Director of Enforcement within 30 days of the end of October and April. These reports shall include the following:
- a. Emissions of POC in lbs/consecutive 12-month period;
 - b. Emissions of NPOC in lbs/consecutive 12-month period;
 - c. Emissions of any individual HAP in lbs/consecutive 12-month period; and
 - d. Emissions of all combined HAPs in lbs/consecutive 12-month period.
- These reports shall be submitted to the Director of Compliance and Enforcement by November 30 and May 30 of each year.

