



DRAFT

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**STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR MANAGEMENT**

**NEW SOURCE REVIEW PERMIT
TO CONSTRUCT AND OPERATE
A STATIONARY SOURCE**

Issued pursuant to Title 22a of the Connecticut General Statutes (CGS) and Section 22a-174-3a of the Regulations of Connecticut State Agencies (RCSA).

Owner/Operator:	Syntac Coated Products, LLC
Address:	29 Industrial Park Road, New Hartford, CT 06057
Equipment Location:	29 Industrial Park Road, New Hartford, CT 06057
Equipment Description:	Reverse Roll Coater, Curing Oven and Catalytic Oxidizer with Primary Heat Recovery (Line No. 1)

Town-Permit Numbers:	116-0024
Premises Number:	25
Permit Issue Date:	
Expiration Date:	NONE

Gina McCarthy
Commissioner

Date

PERMIT FOR A SURFACE COATING OPERATION

**STATE OF CONNECTICUT, DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR MANAGEMENT**

PART I. PROCESS DESCRIPTION

A. General Process Description

Syntac Coated Products, LLC manufactures pressure sensitive tape and label materials at its facility in New Hartford, Connecticut.

Line No. 1 consists of a reverse roll coater followed by a four zone propane-air fired oven and a catalytic oxidizer with primary heat recovery.

The surface coating operation is subject to the requirements of RCSA §§22a-174-20(o) and 20(q) because it coats fabric and paper, respectively. It is also subject to the Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations (40 CFR 60, Subpart RR) because the coating line is used in the manufacture of pressure sensitive tape and label materials.

B. Equipment Specifications and Operating Parameter Limitations

1. Boart Reverse Roll Coater, Black Clawson Model No. 21 221
 - a. Coatings Applied: Adhesives
 - b. Boart Reverse Roll Coater Maximum Coater Rated Capacity (gallons per hour): 55
 - c. Maximum Coater Application Rate (gallons per hour): 55
 - d. Maximum Coating Consumption over any consecutive 12 month period: 1,000,000 lbs.

2. Curing Oven, Boart Model No. 1-1104-2-01
 - a. Fuel Type: Propane-Air
 - b. Maximum Gross Heat Input (MMBTU/hr): 8.5

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PART I. PROCESS DESCRIPTION, continued

3. Boart Catalytic Oxidizer Model No. 4-1006-2-01 with Primary Heat Recovery
 - a. Fuel Type: Propane-Air
 - b. Maximum Gross Heat Input (MMBTU/hr): 5.5
 - c. Gas Flow Rate (scfm): 12,000
 - d. Minimum Inlet Temperature (°F): 100
 - e. Maximum Outlet Temperature (°F): 333
 - f. Minimum Acceptable Operating Temperature of Chamber (°F):
600
 - g. Type of Catalyst: Ribbon in rigid square/rectangular support frame
 - h. Catalyst Bed Area (in²): 6,080
 - i. Maximum Inlet VOC Concentration (lb/hr): 253.16
 - j. Minimum Capture Efficiency (%): 100
 - k. Minimum Overall Control Efficiency (%): 98.3
4. The Permittee shall vent Line No. 1's exhaust to the catalytic oxidizer.
5. The Permittee shall always operate the catalytic oxidizer during operation of Line No. 1.
6. The Permittee shall take all operational steps required to assure that the weight of the total VOC from Line No. 1 conveyed to the catalytic oxidizer does not exceed the Maximum Inlet VOC Concentration.
7. The Permittee shall operate and maintain the catalytic oxidizer in accordance with the vendor's written specifications and recommendations.

C. Stack Parameters

1. Minimum Exhaust Temperature (°F): 308
2. Maximum Exhaust Flow Rate (acfm): 18,113
3. Minimum Distance to Nearest Property Line (feet): 65
4. Minimum Stack Height (feet): 36 above grade

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PART II. ALLOWABLE EMISSION LIMITS

The Permittee shall not cause or allow this equipment to exceed the emission limits stated herein at any time.

A. Criteria Pollutants

1. Surface Coating

<u>Pollutants</u>	<u>lb/hr</u>	<u>tpy</u>
VOC	4.30	12.95

2. Fuel Burning (Oven and Oxidizer)

<u>Pollutants</u>	<u>lb/hr</u>	<u>tpy</u>
PM/PM ₁₀	0.04	0.11
SO _x	0.14	0.43
NO _x	1.32	3.95
VOC	2.81E-02	8.4E-02
CO	0.18	0.54

3. TOTAL

<u>Pollutants</u>	<u>tpy</u>
PM/PM ₁₀	0.11
SO _x	0.43
NO _x	3.95
VOC	13.03
CO	0.54

Demonstration of compliance with the above emission limits shall be met by calculating the emission rates using emission factors from the following sources:

- VOC (Surface Coating): Material Balance
- PM, PM₁₀, NO_x, VOC and CO: USEPA AP-42, 5th edition Section 1.5, October 1996.
- SO_x: Emission Factor from Santa Barbara County Air Pollution Control District

The above statement shall not preclude the commissioner from requiring other means (e.g. stack testing) to demonstrate compliance with the above emission limits, as allowed by state or federal statute, law or regulation.

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PART II. ALLOWABLE EMISSION LIMITS, continued

B. Hazardous Air Pollutants (HAPs)

The Permittee shall not cause or allow emission from this equipment to exceed the maximum allowable stack concentration (MASC) for any pollutant listed in RCSA §22a-174-29.

PART III. STACK EMISSION TEST REQUIREMENTS

Stack emission/performance testing shall be required to determine the Catalytic Oxidizer VOC capture and control efficiencies and compliance with the permitted emissions limits for VOC.

Specific Requirements

- 1. The Permittee shall conduct periodic Bureau of Air Management (Bureau) approved emissions testing, every five years from date of last test, to determine compliance with the emissions limits stated in this permit for VOC, and to demonstrate the capture and control efficiencies of the air pollution control equipment.
2. Such testing shall be conducted in accordance with an Intent-to-Test (ITT) package consisting of an ITT form (Form AE404) and a test protocol submitted by the Permittee and approved, in writing, by the Bureau.
3. The Permittee shall submit the ITT package to the Stack Test Group of the Bureau at least once per each consecutive five years. The initial ITT submittal shall occur within two months of permit issuance.
4. The ITT package shall include provisions to test and report the VOC emissions and the catalytic oxidizer's VOC capture and control efficiency from this equipment.
5. In addition to the requirements of this permit to record data on a daily basis, the ITT Protocol shall include provisions to monitor and record such data over each test run.
6. The Permittee shall conduct testing within six months of the ITT submittal date.

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PART III. STACK EMISSION TEST REQUIREMENTS, continued

7. Within 30 days of completion of the scheduled testing the Permittee shall submit a test report to the Bureau. The test report shall clearly describe all relevant parameters as they occurred during the test. Such parameters shall include, but not be limited to: those parameters required to be measured or monitored by this permit, those parameters relevant to characterize the type and quantity of materials charged and processed during the test.
8. The Bureau may require, as condition of approval of an ITT package, that testing be conducted under specific conditions, which may have occurred historically at the facility. Initial testing shall be conducted while operating at not less than 90 percent of maximum capacity.
9. In the event that a stack test report is unacceptable, or the tested values show that the source is not in compliance with applicable permit conditions or regulations, this permit may be revoked. [RCSA 22a-174-2a(h)]
10. The Permittee shall ensure that such testing is conducted at least once per any consecutive five year period which follows the initial test.
11. The Permittee shall perform an initial performance test to determine compliance with the VOC emission reduction set forth in 40 CFR §60.442(a)(2). The applicable test methods and procedures to be used during compliance testing are stated in 40 CFR §60.446(b). The Permittee shall perform this initial performance test within the latter of 180 days of permit issuance or 60 days of equipment start-up. [40 CFR §§60.8 and 60.442(a)]
12. The performance test shall be conducted by following the procedures outlined in 40 CFR §60.444(c) for facilities controlled by a solvent destruction device. [40 CFR §60.444(c)]

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PART III. STACK EMISSION TEST REQUIREMENTS, continued

- 13. The Permittee shall use either Reference Method 24 or 24A as found at Appendix A of 40 CFR Part 60 to determine the volatile content of surface coatings.
14. The Permittee shall use Method 25 to determine the VOC concentration, in parts per million by volume, of each effluent gas stream entering and exiting the catalytic oxidizer and each effluent gas stream emitted directly to the atmosphere.

PART IV. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS

A. Monitoring Requirements

- 1. The Permittee shall install, calibrate, maintain and operate a monitoring device which continuously indicates and records the gas temperature both upstream and downstream of the catalyst bed.
2. The Permittee shall calculate the required overall VOC emission reduction according to the equations outlined in 40 CFR §60.443(b).
3. The Permittee shall determine calendar monthly compliance by comparing the monthly required overall VOC emission reduction specified in 40 CFR §60.443(b) to the overall VOC emission reduction demonstrated in the most recent performance test which complied with 40 CFR §60.442(a)(2).
4. A separate compliance determination is completed at the end of each calendar month after the initial performance test, and a new calendar month's average VOC emission reduction is calculated to show compliance with the standard.
5. Emissions from startups and shutdowns are normal operation and are to be included when determining if the standard specified in 40 CFR §60.442(a)(2) is being attained.

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6. The Permittee shall install, calibrate, maintain and operate a monitoring device which continuously indicates and records the gas temperature both upstream and downstream of the catalyst bed. [40 CFR §§60.443(e) and 60.445(f)]
7. The Permittee shall calculate the required overall VOC emission reduction according to the equations outlined in 40 CFR §60.443(b). [40 CFR §60.443(b)]
8. The Permittee shall determine calendar monthly compliance by comparing the monthly required overall VOC emission reduction specified in 40 CFR §60.443(b) to the overall VOC emission reduction demonstrated in the most recent performance test which complied with 40 CFR §60.442(a)(2). [40 CFR §60.443(d)]
9. A separate compliance determination is completed at the end of each calendar month after the initial performance test, and a new calendar month's average VOC emission reduction is calculated to show compliance with the standard. [40 CFR §60.443(f)]
10. Emissions from startups and shutdowns are normal operation and are to be included when determining if the standard specified in 40 CFR §60.442(a)(2) is being attained. [40 CFR §60.443(j)]

B. Record Keeping Requirements

1. The Permittee shall keep daily records of all coatings and diluents, such records shall include: [RCSA §22a-174-20(aa)(1)]
 - i. Date coating used;
 - ii. Description of coating, including name and density (lb/gal);
 - iii. Volatile organic compound content by weight (lb VOC/gal);
 - iv. Water and exempt VOC content by weight;
 - v. Non-volatile content by volume and weight;
 - vi. Quantity of coating used (gal); and
 - vii. Quantity of diluent used for each coating (lb, gallons).

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PART IV. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS, cont:

- 2. The Permittee shall calculate a weighted average of the mass of solvent used per mass of coating solids applied for a one calendar month using the procedures outlined in 40 CFR §60.443(a). [40 CFR §60.443(a)]
- 3. The consecutive 12 month record of coating usage and VOC emissions shall be determined by adding the current month's record to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the previous month. [40 CFR 60.446(d)]
- 4. The Permittee shall maintain a calendar month record of all coatings used and the results of the referenced test method specified in 40 CFR §60.446(a) or the manufacturer's formulation data used for determining the VOC content of those coatings. [40 CFR §60.445(a)]
- 5. The Permittee shall keep records of daily, monthly and consecutive 12 month coating usage and VOC emissions.
- 6. The Permittee shall record the date of each change of the catalyst in the bed of the catalytic oxidizer. [RCSA §22a-174-20(aa)(9)]
- 7. The Permittee shall maintain an annual record of the type and quantity of any solvent used for cleaning. In addition, accurate annual records must be kept of the quantity and type of solvents spilled, evaporated, or manifested as waste material.
- 8. Material safety data sheets or technical data sheets for each coating and solvent used shall be maintained. Such material safety data sheets or technical data sheets must include the quantity and type of each hazardous air pollutant contained in the coating or solvent.
- 9. Such daily and monthly records shall clearly display, at a minimum, compliance with all materials usage and emissions limitations set forth in this permit.

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PART IV. MONITORING, RECORD KEEPING AND REPORTING REQUIREMENTS, cont.

- 10. The Permittee shall make and keep records sufficient to determine compliance with the terms and conditions of this permit. Such records shall be made available to the commissioner upon request and kept on site for the duration of the permit or for the previous five years, whichever is less. [RCSA §22a-174-4(d)(3)]

C. Reporting Requirements

- 1. The Permittee shall report the VOC concentration in lb/hr of each effluent gas stream entering and exiting the catalytic oxidizer and each effluent gas stream emitted directly to the atmosphere as determined by Method 25.
2. The Permittee shall submit the performance test data and results from the performance test to the Administrator and commissioner as specified in 40 CFR §60.8(a). [40 CFR §60.447(a)]
3. The Permittee shall submit quarterly reports to the Administrator and commissioner of exceedances of the VOC limits specified in 40 CFR §60.442 and this permit. If no such exceedances occur during a particular quarter, a report stating this shall be submitted. [40 CFR §60.447(b)]
4. The Permittee shall submit at the frequency specified in 40 CFR §60.7(c) reports to the Administrator and commissioner when the average temperature of the catalytic oxidizer is more than 50 °F below the average temperature for three hour periods (40 CFR §60.443(e)). If no such periods occur, the owner or operator shall state this in the report. [40 CFR §60.447(c)]

PART V. PREMISES REQUIREMENTS

A. Federal Hazardous Air Pollutants

- 1. Hazardous Air Pollutant (HAP, as listed in Section 112(b) of the Clean Air Act Amendments of 1990) emissions at the premises shall not be equal to or greater than 10 tons per 12 consecutive months for a single HAP or 25 tons per 12 consecutive months for aggregate HAPs.

PART V. PREMISES REQUIREMENTS, continued

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- 2. The Permittee shall keep records of consecutive 12-month premises HAP emissions.
- 3. The premises HAP emissions shall be based on any consecutive 12 month time period and shall be calculated by adding the current month's HAP emissions to that of the previous 11 months. The Permittee shall make this calculation within 30 days of the previous month.
- B. The Permittee shall not cause or permit the emission of any substance or combination of substances which creates or contributes to an odor beyond the property boundary of the premises that constitutes a nuisance as set forth in RCSA §22a-174-23.
- C. The Permittee shall cover all drums and vessels that contain solvents, cleaners, coatings, or cleaning rags so as to minimize the amount of VOCs emitted to the atmosphere. Empty containers shall be disposed of in a manner consistent with handling techniques for hazardous materials, as applicable.
- D. Legible signs shall be posted, maintained, and kept clearly visible at all times in both the paint blending and spray booth areas which clearly specify the allowable gallon per hour application rates.
- E. The Permittee shall comply with all applicable sections of the following New Source Performance Standard(s) at all times. (See Appendix C for Detailed Requirements)

40 CFR Part 60, Subpart A
 40 CFR Part 60, Subpart RR

PART VI. ADDITIONAL TERMS AND CONDITIONS

- A. This permit does not relieve the Permittee of the responsibility to conduct, maintain and operate the regulated activity in compliance with all applicable requirements of any federal, municipal or other state agency. Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.

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PART VI. ADDITIONAL TERMS AND CONDITIONS

- B. This permit does not relieve the Permittee of the responsibility to conduct, maintain and operate the regulated activity in compliance with all applicable requirements of any federal, municipal or other state agency. Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- C. Any representative of the DEP may enter the Permittee's site in accordance with constitutional limitations at all reasonable times without prior notice, for the purposes of inspecting, monitoring and enforcing the terms and conditions of this permit and applicable state law.
- D. This permit may be revoked, suspended, modified or transferred in accordance with applicable law.
- E. This permit is subject to and in no way derogates from any present or future property rights or other rights or powers of the State of Connecticut and conveys no property rights in real estate or material, nor any exclusive privileges, and is further subject to any and all public and private rights and to any federal, state or local laws or regulations pertinent to the facility or regulated activity affected thereby. This permit shall neither create nor affect any rights of persons of municipalities who are not parties to this permit.
- F. Any document, including any notice, which is required to be submitted to the commissioner under this permit shall be signed by a duly authorized representative of the Permittee and by the person who is responsible for actually preparing such document, each of whom shall certify in writing as follows: "I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under Section 22a-175 of the Connecticut General Statutes, under Section 53a-157b of the Connecticut General Statutes, and in accordance with any applicable statute."

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PART VI. ADDITIONAL TERMS AND CONDITIONS, continued

- G. Nothing in this permit shall affect the commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, recover costs and natural resource damages, and to impose penalties for violations of law, including but not limited to violations of this or any other permit issued to the Permittee by the commissioner.
- H. Within 15 days of the date the Permittee becomes aware of a change in any information submitted to the commissioner under this permit, or that any such information was inaccurate or misleading or that any relevant information was omitted, the Permittee shall submit the correct or omitted information to the commissioner.
- I. The date of submission to the commissioner of any document required by this permit shall be the date such document is received by the commissioner. The date of any notice by the commissioner under this permit, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is personally delivered or the date three days after it is mailed by the commissioner, whichever is earlier. Except as otherwise specified in this permit, the word "day" means calendar day. Any document or action which is required by this permit to be submitted or performed by a date which falls on a Saturday, Sunday or legal holiday shall be submitted or performed by the next business day thereafter.
- J. Any document required to be submitted to the commissioner under this permit shall, unless otherwise specified in writing by the commissioner, be directed to: Office of Director; Engineering & Enforcement Division; Bureau of Air Management; Department of Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.

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Appendices attached (Applicable if -X- checked):

- A Continuous Emission Monitoring Requirements
- B Stack Emission Test Requirements
- C New Source Performance Standards
- E Control Equipment Design Specifications

Town No: 116

Premises No: 25

Permit No: 24

Stack No: 1