

Textile Tapes Corporation  
George Nadeau Drive  
Gonic, NH 03839

**FINAL RACT ORDER**  
**ARD-96-001**  
**October 4, 1996**

**A. Introduction**

This RACT Order is issued by the New Hampshire Department of Environmental Services, Air Resources Division, to Textile Tapes Corporation, pursuant to RSA 125-C.

**B. Parties**

1. The New Hampshire Department of Environmental Services, Air Resources Division ("NHDES-ARD"), is a duly constituted administrative agency of the State of New Hampshire having its principal offices at 64 North Main Street, Concord, NH 03302-2033, telephone number (603) 271-1370.
2. Textile Tapes Corporation is a New Hampshire corporation, having a mailing address of P.O. Box 7334, Gonic, NH 03839, telephone number (603) 335-5816.

**C. Statements of Fact and Law**

1. Textile Tapes Corporation owns and operates the following processes located at its Gonic Plant at George Nadeau Drive in Gonic, NH ("the Facility"):
  - a. Line 1A, Fabric Coating Line;
  - b. Line 1B, Fabric Coating Line;
  - c. Line 1C, Hot Melt Coating Line (installed in 1993).
2. Effective August 19, 1995, NHDES-ARD re-adopted Rule PART Env-A 1204 VOLATILE ORGANIC COMPOUNDS (VOCs) with amendments.
3. Textile Tapes Corporation filed a "Reasonable Available Control Technology (RACT) Statement" on March 15, 1993 for the facility.
4. NHDES-ARD issued a Letter of Insufficiency dated May 19, 1993.
5. Textile Tapes Corporation filed a VOC RACT compliance schedule, in response to NHDES-ARD's Letter of Insufficiency, on June 10, 1993 as amendment to the March 15, 1993 submittal.

6. NHDES-ARD issued a letter on February 8, 1995 requesting an updated VOC RACT plan.
7. Textile Tapes Corporation filed further revisions to update its VOC RACT plan as requested by NHDES-ARD on February 24, 1995.
8. Textile Tapes Corporation filed an evaluation of RACT control options and an application for a RACT order pursuant to ENV-A 1204.05 on December 7, 1995.
9. Textile Tapes Corporation reported to NHDES-ARD that 1990 total VOC emissions were 90 tons and noted that the facility was operated by a company other than Textile Tapes in 1990.
10. Textile Tapes Corporation initially, in letters dated March 15, 1993 and June 10, 1993, proposed the following measures as RACT:
  - a. For Line 1A, Line 1B and Line 1C comply with the provisions of Env-A 1204.10, Applicability Criteria and Compliance Standards for Coating of Paper, Fabric, Film and Foil Substrates, which limits the emission rate of VOC at all times to 2.9 lb/gallon of coating; as applied, excluding water and exempt compounds, for all but one coating; and
  - b. For the coating described as "5001 adhesive", utilized on Line 1A and 1B:
    - i. Reformulate the "5001 adhesive" to comply with the emission limitation in C.10.a., above;
    - ii. Install a thermal oxidizer to control VOC emissions equivalent to the emission limitation in C.10.a.; or
    - iii. Subcontract all coating activities which would result in emission rates exceeding the emission limitation in C.10.a.
11. Textile Tapes Corporation ultimately proposed the following measures as RACT in its December 7, 1995 application for RACT order:
  - a. For Line 1A, Line 1B and Line 1C comply with the provisions of Env-A 1204.10, Applicability Criteria and Compliance Standards for Coating of Paper, Fabric, Film and Foil Substrates, which limits the emission rate of VOC at all times to 2.9 lb VOC/gallon of coating; as applied, excluding water and exempt compounds, for all but one coating;

- b. For the coating described as "5000 series adhesive", utilized on Line 1A and 1B:
    - i. Increase solids content of "5000 series adhesive" from 33% by weight to 40% by weight.
    - ii. Limit the emission rate of VOC resulting from the application of the "5000 series adhesive" at all times to 4.7 lb VOC/gallon of coating, as applied, less water and exempt compounds;
  - c. Limit facility-wide VOC emissions to 70 tons, on a 12 month rolling basis; and
  - d. File annual reports detailing efforts to meet the emission limitation in C.11.a. for all coatings.
12. On June 28, 1996, NHDES-ARD received Textile Tapes' application for Title V permitting as required by Env-A 609. The application includes a request for permit amendment to include the limits specified in the order in the Title V permit once issued.

#### **D. Order**

Based on the above findings and determinations, NHDES-ARD hereby orders Textile Tapes Corporation as follows:

1. Textile Tapes Corporation shall implement the following as RACT:
  - a. For Line 1A, Line 1B and Line 1C the facility shall comply with the provisions of Env-A 1204.10, Applicability Criteria and Compliance Standards for Coating of Paper, Fabric, Film and Foil Substrates, which limits the emission rate of VOC at all times to 2.9 lb VOC/gallon of coating; as applied, excluding water and exempt compounds, for all but one coating;
  - b. For the coating described as "5000 series adhesive", utilized on Line 1A and 1B, the facility shall:
    - i. Increase solids content of "5000 series adhesive" from 33% by weight to 40% by weight;
    - ii. Limit the emission rate of VOC resulting from the application of the "5000 series adhesive" at all times to 4.7 lb VOC/gallon of coating, as applied, less water and exempt compounds;
  - c. Limit facility-wide VOC emissions to 70 tons, on a 12 month rolling basis; and

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- d. File annual reports detailing efforts to meet the emission limitation in D.2.a. for all coatings including:
  - i. Technical evaluation of each alternative coating considered; and
  - ii. Technical basis for acceptance or rejection of each coating evaluated.
2. Textile Tapes Corporation shall determine compliance with D.1.a. and D.1.b.ii. by the testing methods in Env-A 803.03 (U.S. EPA Method 24) within 60 days of receipt of this order. Submit a report of the test results and calculations demonstrating compliance within 30 days of completion of the testing.
3. Comply with the permits to be issued by NHDES-ARD.

Please address any correspondence and communication in reference to this Order to:

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Engineering Bureau  
NHDES, Air Resources Division  
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Kenneth A. Colburn, Director *For KATE*  
Air Resources Division

cc: Timothy Drew, PIP Office  
David Conroy, US EPA  
Town Selectmen