

2 June 2003

Mr. Arthur McGinnis, Jr.
Vice President of Operations
FORTUNE METAL, INC.
2 Crow Point
Lincoln, RI

Dear Mr. McGinnis:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your applications for the installation of a furnace and air pollution control equipment at your 2 Crow Point Road, Lincoln facility.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval Nos. 1752-1755).

I can be reached at 222-2808, extension 7011 if you have any questions.

Very truly yours,

Douglas L. McVay
Associate Supervising Engineer
Office of Air Resources

cc: Lincoln Building Official
Toyenco, Inc. – Pete Toy, John Hird

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES

MINOR SOURCE PERMIT

FORTUNE METAL, INC.

APPROVAL Nos. 1752-1755

Pursuant to the provisions of Air Pollution Control Regulation No. 9, this minor source permit is issued to:

Fortune Metal, Inc.

For the following:

Installation of an Industrial Incinerator Company, Model No. IIC-2000 reclamation furnace

(Approval No. 1752) to process copper and lead wire. Installation of a Griffen, Model No.

JA-420-CG baghouse, (Approval No. 1753) to treat particulate emissions from the reclamation

furnace. Installation of a Fuller, Model 448-s10 baghouse, (Approval No. 1754) to treat

particulate emissions from wire chopping line #1. Installation of a Griffen, Model No SJA-CG

baghouse (Approval No. 1755) to treat particulate emissions from wire chopping line #2.

Located at:

2 Crow Point Road, Lincoln

This permit shall be effective from the date of its issuance and shall remain in effect until revoked by or surrendered to the Department. This permit does not relieve *Fortune Metal, Inc.* from compliance with applicable state and federal air pollution control rules and regulations. The design, construction and operation of this equipment shall be subject to the attached permit conditions and emission limitations.

Stephen Majkut, Chief
Office of Air Resources

Date of issuance

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES**

Permit Conditions and Emissions Limitations

FORTUNE METAL, INC.

Approval Nos. 1752-1755

A. Emission Limitations

1. The concentration of particulate emissions discharged to the atmosphere from the reclamation furnace shall not exceed 0.02 grains per dry standard cubic foot.
2. Particulate emissions from wire chopping operations on Line #1 and Line #2 shall be reduced by 99% or greater before discharge to the atmosphere.
3. Visible emissions from each baghouse shall not exceed 10% opacity (six-minute average).

B. Operating Requirements

1. Particulate emissions generated from the wire reclamation furnace shall be captured, contained, and routed to a baghouse for treatment prior to discharge to the atmosphere.
2. Particulate emissions generated from Wire Chopping Line #1 shall be captured, contained, and routed to a baghouse for treatment prior to discharge to the atmosphere.
3. Particulate emissions generated from Wire Chopping Line #2 shall be captured, contained, and routed to a baghouse for treatment prior to discharge to the atmosphere.
4. The total weight of material charged to the wire reclamation furnace shall not exceed 2,000 lbs per batch.
5. The wire charge shall be placed in racks and the racks shall be placed on the primary combustion chamber's angle iron shelves in such a manner as to minimize the amount of underfire air.

6. The furnace charge door shall remain during the burning of a charge.
7. The primary burners in the wire reclamation furnace shall not be fired unless the secondary chamber temperature is at or above 1600°F.
8. The secondary chamber temperature shall be maintained at a minimum of 1600°F, and the secondary chamber volume shall be of sufficient capacity to provide a minimum residence time for combustion gases of 1.5 second at 1600°F.
9. The secondary chamber thermocouple shall be located as close to the secondary chamber exit as possible or at a location that represents a minimum of a 1.5 second residence time at 1600°F.
9. An operator shall always be in attendance whenever the wire reclamation furnace is operating.
10. There shall be no burning of plastic or PVC insulated wire in the wire reclamation furnace.

C. Continuous Monitors

1. The secondary chamber temperature of the wire reclamation furnace and the inlet temperature to the wire reclamation furnace baghouse shall be monitored and recorded continuously.
2. The pressure drop across each baghouse shall be monitored continuously and checked a minimum of once per day and the date, time and measurement shall be recorded.
3. Once per week, the owner/operator shall inspect each baghouse. The owner/operator shall, at a minimum, check the following during this inspection:
 - Inspect the bags for leaks and wear.
 - Check the cleaning sequence of the baghouse
 - Check the compressed air supply.

If leaks or abnormal conditions are detected, action to correct the abnormal condition shall be implemented before the baghouse is put back into service.

D. Recordkeeping and Reporting

1. The owner/operator shall maintain the following records on a daily basis:
 - a. The number of batches processed in the wire reclamation furnace each day including the date and time the wire reclamation furnace is loaded for each batch.
 - b. The weight of each batch in pounds.
 - c. A description of the waste material processed in the wire reclamation furnace for each batch.
 - d. The pressure drop across each baghouse.
2. The owner/operator shall maintain records of the secondary chamber temperature of the wire reclamation furnace and the inlet temperature to the wire reclamation furnace baghouse.
3. The owner/operator shall notify the Office of Air Resources in writing of the anticipated date of the initial start-up of the Industrial, Model No IIC-2000 wire reclamation furnace not more than 60 days nor less than 30 days of the anticipated date.
4. The owner/operator shall notify the Office of Air Resources, in writing, of the date of actual initial start-up of the wire reclamation furnace no later than fifteen days after such date.
5. The owner/operator shall notify the Office of Air Resources, in writing, of the date of actual initial start-up of each of the three baghouses no later than fifteen days after such date.
6. The owner/operator shall notify the Office of Air Resources of any anticipated noncompliance with the terms of this permit or any other applicable air pollution control rules and regulations.
7. The owner/operator shall notify the Office of Air Resources, in writing, of any noncompliance with the terms of this permit within 30 calendar days of becoming aware of such occurrence and supply the Director with the following information:
 - a. The name and location of the facility;
 - b. The subject source(s) that caused the noncompliance with the permit term;

- c. The time and date of first observation of the incident of noncompliance;
 - d. The cause and expected duration of the incident of noncompliance;
 - e. The estimated rate of emissions (expressed in lbs/hr or lbs/day) during the incident and the operating data and calculations used in estimating the emission rate.
 - f. The proposed corrective actions and schedule to correct the conditions causing the incidence of noncompliance.
8. The owner/operator shall notify the Office of Air Resources in writing of any planned physical or operational change to any equipment that would:
- a. Change the representation of the facility in the application.
 - b. Alter the applicability of any state or federal air pollution rules or regulations.
 - c. Result in the violation of any terms or conditions of this permit.
 - d. Qualify as a modification under APC Regulation No. 9.

Such notification shall include:

- Information describing the nature of the change.
- Information describing the effect of the change on the emission of any air contaminant.
- The scheduled completion date of the planned change.

Any such change shall be consistent with the appropriate regulation and have the prior approval of the Director.

9. All records required in this permit shall be maintained for a minimum of five years after the date of each record and shall be made available to representatives of the Office of Air Resources upon request.

E. Malfunctions

1. A malfunction of any air pollution control system that would result in the exceedance of any emission limitation applicable to this facility will necessitate the shutdown of the process discharging to the baghouse. The process must remain shutdown until the malfunction has been identified and corrected.
2. The owner/operator may seek to establish that a malfunction of any air pollution control system that would result in noncompliance with any of the terms of this permit or any other applicable air pollution control rules and regulations was due to unavoidable increases in emissions attributable to the malfunction. To do so, the owner/operator must demonstrate to the Office of Air Resources that:
 - a. The malfunction was not attributable to improperly designed air pollution control equipment, lack of preventative maintenance, careless or improper operation, or operator error;
 - b. The malfunction was not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
 - c. Repairs were performed in an expeditious fashion. Off-shift labor and overtime should be utilized, to the extent practicable, to ensure that such repairs were completed as expeditiously as practicable.
 - d. All possible steps were taken to minimize emissions during the period of time that the repairs were performed.
 - e. Emissions during the period of time that the repairs were performed will not:
 - (1) Cause an increase in the ground level ambient concentration at or beyond the property line in excess of that allowed by Air Pollution Control Regulation No. 22 and any Calculated Acceptable Ambient Levels; and
 - (2) Cause or contribute to air pollution in violation of any applicable state or national ambient air quality standard.
 - f. The reasons that it would be impossible or impractical to cease the source operation during said period.
 - g. The owner/operator's action in response to the excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence.

This demonstration must be provided to the Office of Air Resources, in writing, within two working days of the time when the malfunction occurred and contain a description of the malfunction, any steps taken to minimize emissions and corrective actions taken.

The owner/operator shall have the burden of proof in seeking to establish that noncompliance was due to unavoidable increases in emissions attributable to the malfunction.

F. Other Permit Conditions

1. To the extent consistent with the requirements of this permit and applicable federal and state laws, the facility shall be designed, constructed and operated in accordance with the representation of the facility in the permit application prepared by Toyenco, Inc. dated February 2003.
2. Employees of the Office of Air Resources and its authorized representatives shall be allowed to enter the facility at all times for the purpose of inspecting any air pollution source, investigating any condition it believes may be causing air pollution or examining any records required to be maintained by the Office of Air Resources.
3. A visolite test of the wire reclamation furnace baghouse shall be performed prior to initial startup of the furnace and once per year thereafter. A written report of the results of the test and any corrective action taken or to be taken shall be submitted to the Office of Air Resources within 10 days of completion of the test.
4. There shall be no bypassing of any baghouses during times when the operations that are exhausted to the baghouses, are in use.
5. At all times, including periods of startup, shutdown and malfunction, the owner/operator shall, to the extent practicable, maintain and operate the facility in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Office of Air Resources, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
6. Approval Nos. 555, 1283, and 1348 issued for the East Providence location is revoked. This revocation will become effective with the startup of the furnace and two baghouses at the Lincoln facility.