

2 October 2006

Mr. George Papanier
BLB Investors, LLC
Lincoln Park Raceway
1600 Louisquisset Pike
Lincoln, RI 02865

Dear Mr. Ahles:

The Department of Environmental Management, Division of Air Resources has reviewed and approved your application for the installation of fuel burning equipment at your facility located at 1600 Louisquisset Pike, Lincoln, RI.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval Nos. 1914-1920).

During the course of our review of your application, we determined that the 1000 kW emergency generator located at 1600 Louisquisset Pike was installed in February 2005. Lincoln Park Raceway failed to obtain a preconstruction permit prior to the installation of this equipment as required by RI Air Pollution Control Regulation No. 9.

The issuance of this minor source permit will now bring Lincoln Park Raceway into compliance with the requirement to obtain a preconstruction permit. The issuance of this permit does not limit or otherwise preclude the RI DEM from pursuing enforcement actions to address the failure to obtain a preconstruction permit prior to the installation of the equipment.

If there are any questions concerning this permit, please contact me at 222-2808, extension 7011.

Sincerely,

Douglas L. McVay
Associate Supervising Engineer
Office of Air Resources

cc: Lincoln Building Official
David Ahles – BLB
Eric Epner – Fuss & O'Neill

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

MINOR SOURCE PERMIT

LINCOLN PARK RACEWAY

APPROVAL NOS. 1914-1920

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

Lincoln Park Raceway

For the following:

Installation of three(3) Johnston Boiler Co. 11.2 MMBtu/hr boilers, Model No. PFXT-250-3X125W (Approval Nos. 1914-1916); three (3) 1500 kW Caterpillar emergency diesel generators, Model No. 3512B; (Approval Nos. 1917-1919) and one (1) 1000 kW Caterpillar emergency diesel generator, Model No. 3508B (Approval No. 1920). The fuel burning equipment shall be fired with fuel oil containing 0.05% sulfur, by weight, or less.

Located at: *1600 Louisquisset Pike, 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 *Lincoln Park Raceway* 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 Emission Limitations

LINCOLN PARK RACEWAY

APPROVAL NOS. 1914-1920

A. Emission Limitations

1. Boilers

a. Nitrogen Oxides (as nitrogen dioxide (NO₂))

The emission rate of nitrogen oxides discharged to the atmosphere from each boiler shall not exceed 0.14 lb per million BTU heat input or 1.6 lbs/hr, whichever is more stringent.

b. Carbon Monoxide (CO)

The emission rate of carbon monoxide discharged to the atmosphere from each boiler shall not exceed 0.04 lb per million BTU heat input or 0.4 lbs/hr, whichever is more stringent.

c. Sulfur Dioxide (SO₂)

(1) All fuel burned in each boiler shall contain no more than 0.05 percent sulfur by weight.

(2) The emission rate of sulfur dioxide discharged to the atmosphere from each boiler shall not exceed 0.58 lbs/hr.

d. Particulate Matter

The emission rate of particulate matter discharged to the atmosphere from each boiler shall not exceed 0.02 lb per million BTU heat input or 0.26 lb/hr, whichever is more stringent.

e. Total Nonmethane Hydrocarbons (NMHC)

The emission rate of total nonmethane hydrocarbons discharged to the atmosphere from each boiler shall not exceed 0.003 lb per million BTU heat input or 0.03 lb/hr, whichever is more stringent.

- f. Visible emissions from the boiler stack shall not exceed 10% opacity (six-minute average).

2. Emergency Generators

a. Sulfur Dioxide

All diesel fuel burned in each engine/generator set shall contain no more than 0.05 percent sulfur by weight.

- b. Visible emissions from each engine/generator set shall not exceed 10% opacity except for a period or periods aggregating no more than three minutes in any one-hour. This visible emission limitation shall not apply during startup of the engine. Engine startup shall be defined as the first ten minutes of firing following the initiation of firing.

3. Facility-wide

- a. All distillate or diesel fuel oil burned in any fuel burning device shall contain no more than 0.05% sulfur, by weight.

B. Operating Requirements

1. Boilers

- a. The maximum firing rate of each boiler shall not exceed 80 gal/hr of No. 2 fuel oil.
- b. The owner/operator shall limit the total combined quantity of No. 2 fuel oil combusted in the boilers to 750,000 gallons or less for any consecutive 12-month period.

2. Emergency Generators

- a. The maximum firing rate for each 1500 kW engine/generator set shall not exceed 104 gallons per hour.
- b. The maximum firing rate for the 1000 kW engine/generator set shall not exceed 72.5 gallons per hour.
- c. Each engine/generator set shall not operate more than 400 hours in any consecutive 12-month period.

- d. Each engine/generator set shall be operated only to provide emergency electrical power in the event of a power outage or for maintenance purposes to assure that the equipment is in working order.
- e. The engine/generator sets shall not be used in conjunction with any utility voluntary demand reduction program.

C. Continuous Monitors

- 1. Continuous emission monitoring equipment shall be installed, operated and maintained for opacity from the boilers.
- 2. Each of the emergency generators shall be equipped with non-resettable elapsed time meters to indicate, in cumulative hours, the elapsed engine operating time.

D. Fuel Oil Testing

- 1. Compliance with the fuel oil sulfur limits may be determined based on a certification from the fuel supplier. Fuel supplier certifications shall include the following information:
 - a. The name of the fuel supplier;
 - b. The sulfur content of the fuel from which the shipment came or the shipment itself;
 - c. The location of the fuel when the sample was drawn for analysis to determine the sulfur content of the fuel, specifically including whether the fuel was sampled as delivered to Lincoln Park Raceway or whether the sample was drawn from fuel in storage at the fuel supplier's facility or another location;
 - d. The method used to determine the sulfur content of the fuel.
- 2. As an alternative to fuel supplier certification, the owner/operator may elect to sample the fuel prior to combustion. Sampling and analysis shall be conducted for the fuel in the initial tank(s) of fuel to be fired in each boiler, generator, pump engine or hot water heater and after each new shipment of fuel is received. Samples shall be collected from the fuel tank immediately after the fuel tank is filled and before any fuel is combusted.

3. Each fuel supplier certification or each fuel oil analysis must demonstrate that the fuel oil contains 0.05 percent sulfur by weight, or less.

E. Record Keeping and Reporting

1. The owner/operator shall, on a monthly basis, no later than 5 days after the first of the month, determine the total quantity of fuel oil combusted by the boilers during the previous 12 months. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.
2. The owner/operator shall notify the Office of Air Resources in writing, within 15 days, whenever the total combined quantity of fuel oil combusted in the boilers exceeds 750,000 gallons for any consecutive 12 month period.
3. The owner/operator shall, on a monthly basis, no later than 5 days after the first of each month, determine and record the hours of operation and fuel use for each emergency generator during the previous 12 month period.
4. The owner/operator shall notify the Office of Air Resources, in writing, within 15 days, whenever the hours of operation of any emergency generator exceeds 400 hours for any consecutive 12 month period.
5. The owner/operator shall, on a monthly basis, no later than 5 days after the first of each month, determine and record the hours of operation and fuel use for the Detroit Diesel Fire Pump engine during the previous 12 month period.
6. The owner/operator shall notify the Office of Air Resources, in writing, within 15 days, whenever the hours of operation of the Detroit Diesel Fire Pump engine exceeds 500 hours for any consecutive 12 month period.
7. The owner/operator shall notify the Office of Air Resources, in writing, of the actual initial start-up of the boilers, no later than 15 days after such date.
8. The owner/operator shall notify the Office of Air Resources, in writing, of the date of actual initial start-up of the three 1500 kW engine/generator sets, no later than 15 days after such date.
9. The owner/operator shall maintain copies of all fuel supplier certifications or fuel analyses and these copies shall be made accessible for review by the Office of Air Resources or its authorized representative and EPA. These records shall include a certified statement, signed by the

owner/operator of the facility, that the records represent all of the fuel combusted at the facility

10. 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.

11. 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.
12. 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.
13. All records required as a condition of this approval must be made available to the Office of Air Resources or its representative upon request. These records must be maintained for a minimum of five years after the date of each record.

F. Other Permit Conditions

- 1. To the extent consistent with the requirements of this approval and applicable Federal and State laws, the fuel burning equipment shall be designed, constructed and operated in accordance with the representation of the facility in the permit application.
- 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. 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.
- 4. Operation of the three 1500 kW emergency generators shall not commence and operation of the 1000 kW emergency generator shall not continue until the stack height for each of the units is extended to 30 feet above ground level.
- 5. Each boiler is subject to the requirements of the Federal New Source Performance Standards 40 CFR 60, Subparts A (General Provisions), and Dc (Small Industrial-Commercial-Institutional Steam Generating Units). Compliance with all applicable provisions of these regulations is required.

6. The emission and dispersion characteristics of the three boilers and the four engine/generator sets at the facility shall be consistent with the parameters used in the air quality modeling to demonstrate that the emissions from the facility do not cause or contribute to air pollution in violation of any national ambient air quality standard. The Office of Air Resources, in its sole discretion, may reopen this minor source permit if it determines that the emission and dispersion characteristics have changed significantly and that emission limitations must be revised and/or added to this permit to ensure that the facility does not cause or contribute to air pollution in violation of any national ambient air quality standard.