

10 November 2006

Mr. David Gibbons
Bradford Dyeing Association, Inc.
P.O. Box 539
Westerly, RI 02891

Dear Mr. Gibbons:

The Department of Environmental Management, Office of Air Resources, has reviewed and approved your application for the installation of process equipment and air pollution control equipment at your 460 Bradford Road facility in Bradford, RI.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval Nos. 1922-1924).

Additionally, we have revised Approval No. 1792, issued on 17 March 2004, to make the terms and conditions of that minor source permit consistent with the terms and conditions of this minor source permit. Enclosed is the revised minor source permit (Approval No. 1792).

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

Sincerely,

Douglas L. McVay
Associate Supervising Engineer
Office of Air Resources

cc: Westerly Building Official

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

MINOR SOURCE PERMIT

BRADFORD DYEING ASSOCIATION, INC.

APPROVAL NOs. 1922-1924

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

Bradford Dyeing Association, Inc.

For the following:

Putting into service the No. 9 tenter frame (Approval No. 1922) and installation of a VMB

Systems Model M-12 Smoke Abater (Approval No. 1923) which will treat emissions generated

from the No. 9 tenter frame exhausts prior to discharge to the atmosphere. Installation of a

VMB Systems Model M-16 Smoke Abater (Approval No. 1924) which will treat emissions

generated from the No. 1 tenter frame exhausts prior to discharge to the atmosphere.

Located at: *460 Bradford Road, Bradford*

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 *Bradford Dyeing Association, 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 Emission Limitations

BRADFORD DYEING ASSOCIATION, INC.

APPROVAL NOs. 1922-1924

A. Emission Limitations

1. Tenter Frame No. 9 (Emission Unit P521)
 - a. There shall be no visible emissions from Tenter Frame No. 9. Where the presence of uncombined water is the only reason for failure to meet this requirement, such failure shall not be a violation of this requirement.
 - b. Anytime visible emissions are being generated from Tenter Frame No. 9, all emissions shall be captured and discharged to the air pollution control system consisting of a Smoke Abater.
2. Tenter Frame No. 1 (Emission Unit P501)
 - a. There shall be no visible emissions from Tenter Frame No. 1. Where the presence of uncombined water is the only reason for failure to meet this requirement, such failure shall not be a violation of this requirement.
 - b. Anytime visible emissions are being generated from Tenter Frame No. 1, all emissions shall be captured and discharged to the air pollution control system consisting of a Smoke Abater.

B. Operating Requirements

1. Each Smoke Abater shall be operated at a minimum temperature of 500°F whenever visible emissions are being discharged to the device.
2. There shall be no bypassing of any Smoke Abater during times when visible emissions are being discharged to the device.

C. Continuous Monitor

1. The operating temperature of each Smoke Abater shall be monitored, indicated and recorded continuously.

2. Pressure drop across each diffuser grid shall be monitored and indicated continuously.

D. Recordkeeping and Reporting

1. The owner/operator shall maintain records of the operating temperature of each Smoke Abater.
2. The pressure drop across each diffuser grid shall be checked a minimum of once per day and the date, time and reading shall be recorded.
3. The owner/operator shall notify the Office of Air Resources, in writing, of the date of actual initial start-up of the No. 9 tenter frame no later than fifteen days after such date.
4. 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.
5. Deviations from permit conditions shall be reported, in writing, within (5) business days of the deviation, to the Office of Air Resources. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.
6. The Office of Air Resources shall be notified, in writing, of any planned physical or operational change to a Smoke Abater or the equipment vented to a Smoke Abater that would:
 - a. Change the representation of the facility in the permit 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 the 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 a change shall be consistent with the appropriate regulation and have the prior approval of the Director.

7. 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. Malfunction means a sudden and unavoidable breakdown of process or control equipment. In the case of a malfunction of any air pollution control system, all reasonable measures shall be taken to assure resumption of the designed control efficiency as soon as possible. In the event that the malfunction of an air pollution control system is expected or may reasonably be expected to continue for longer than 24 hours and if the owner or operator wishes to operate the source on which it is installed at any time beyond that period, the Director shall be petitioned for a variance under Section 23-23-15 of the General Laws of Rhode Island, as amended. Such petition shall include, but is not limited to, the following:
 - a. Identification of the specific air pollution control system and source on which it is installed;
 - b. The expected period of time that the air pollution control system will be malfunctioning or out of service;
 - c. The nature and quantity of air contaminants likely to be emitted during said period;
 - d. Measures that will be taken to minimize the length of said period;
 - e. The reasons that it would be impossible or impractical to cease the source operation during said period.
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.
- 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. The owner/operator shall shut down a tenter frame in the event of a malfunction of the Smoke Abater that results in or that could result in, emissions in excess of the permit limits. The equipment shall remain shutdown until the malfunction has been identified and corrected.
4. At all times, including periods of startup, shutdown and malfunction, the owner/operator shall, to the extent practicable, maintain and operate the equipment 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.
5. The owner/operator shall file a completed Air Toxics Operating Permit application with the Department on forms furnished by the Department within 90 days of startup of the No. 9 tenter frame.
6. Approval Nos. 1835-1836, issued on 21 March 2005, is revoked effective from the date of issuance of this permit.

PCMIN-BRADFORD 06

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

MINOR SOURCE PERMIT

BRADFORD DYEING ASSOCIATION, INC.

APPROVAL NO. 1792

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

Bradford Dyeing Association, Inc.

For the following:

Revised permit conditions and emission limitations to be consistent with minor source permits for Smoke Abaters for Tenter Frames Nos. 1 and 9.

Located at: *460 Bradford Road, Bradford*

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 *Bradford Dyeing Association, 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 Emission Limitations

BRADFORD DYEING ASSOCIATION, INC.

APPROVAL NO. 1792

A. Emission Limitations

1. Tenter Frame No. 4 (Emission Unit P504)
 - a. There shall be no visible emissions from Tenter Frame No. 4. Where the presence of uncombined water is the only reason for failure to meet this requirement, such failure shall not be a violation of this requirement.
 - b. Anytime visible emissions are being generated from Tenter Frame No. 4, all emissions shall be captured and discharged to the air pollution control system consisting of a Smoke Abater.

B. Operating Requirements

1. The Smoke Abater shall be operated at a minimum temperature of 500°F whenever visible emissions are being discharged to the device.
2. There shall be no bypassing of the Smoke Abater during times when visible emissions are being discharged to the device.

C. Continuous Monitor

1. The operating temperature of the Smoke Abater shall be monitored, indicated and recorded continuously.
2. Pressure drop across the diffuser grid shall be monitored and indicated continuously.

D. Recordkeeping and Reporting

1. The owner/operator shall maintain records of the operating temperature of the Smoke Abater.
2. The pressure drop across the diffuser grid shall be checked a minimum of once per day and the date, time and reading shall be recorded.

3. 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.
4. Deviations from permit conditions shall be reported, in writing, within (5) business days of the deviation, to the Office of Air Resources. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.
5. The Office of Air Resources shall be notified, in writing, of any planned physical or operational change to the Smoke Abater or Tenter Frame No. 4 that would:
 - a. Change the representation of the facility in the permit 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 the 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 a change shall be consistent with the appropriate regulation and have the prior approval of the Director.

6. 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. Malfunction means a sudden and unavoidable breakdown of process or control equipment. In the case of a malfunction of any air pollution control system, all reasonable measures shall be taken to assure resumption of the designed control efficiency as soon as possible. In the event that the malfunction of an air pollution control system is expected or may reasonably be expected to continue for longer than 24 hours and if the owner or operator wishes to operate the source on which it is installed at any time beyond that period, the Director shall be petitioned for a

variance under Section 23-23-15 of the General Laws of Rhode Island, as amended. Such petition shall include, but is not limited to, the following:

- a. Identification of the specific air pollution control system and source on which it is installed;
 - b. The expected period of time that the air pollution control system will be malfunctioning or out of service;
 - c. The nature and quantity of air contaminants likely to be emitted during said period;
 - d. Measures that will be taken to minimize the length of said period;
 - e. The reasons that it would be impossible or impractical to cease the source operation during said period.
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.
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. The owner/operator shall shut down the tenter frame in the event of a malfunction of the Smoke Abater that results in or that could result in, emissions in excess of the permit limits. The equipment shall remain shutdown until the malfunction has been identified and corrected.
4. At all times, including periods of startup, shutdown and malfunction, the owner/operator shall, to the extent practicable, maintain and operate the equipment 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.