

12 April 2007

Mr. Thomas Miozzi
Coventry Asphalt, LLC
75 Airport Road
Coventry, RI 02816

Dear Mr. Miozzi:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for the installation of a baghouse at your facility located at 75 Airport Road, Coventry.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval No. 1972).

During the course of our review of your application, we determined that the baghouse was installed in 2005. Coventry Asphalt, LLC 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 Coventry Asphalt, LLC 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

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

MINOR SOURCE PERMIT

COVENTRY ASPHALT, LLC

APPROVAL NO. 1972

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

Coventry Asphalt, LLC

For the following:

Installation of an Astec Model No. PBH-55.5.5 baghouse to control particulate emissions generated from the rotary dryer.

Located at: *75 Airport Road, Coventry*

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 *Coventry Asphalt, LLC* 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

COVENTRY ASPHALT, LLC

APPROVAL NO. 1972

A. Emission Limitations

1. Particulates

- a. The concentration of particulate matter discharged to the atmosphere from the baghouse stack shall not exceed 0.03 grains per dry standard cubic foot.
- b. The emission rate of particulate matter discharged to the atmosphere from the baghouse stack shall not exceed 5.6 pounds per hour.

2. Opacity

Visible emissions from the baghouse stack shall not exceed 10 percent opacity (six-minute average).

B. Operating Requirements

1. Particulate emissions generated from the rotary dryer shall be captured, contained, and routed to the baghouse for treatment prior to discharge to the atmosphere.
2. All reasonable precautions shall be taken to prevent visible, fugitive emissions from any of the equipment.

C. Continuous monitors

1. The pressure drop across the baghouse shall be monitored continuously. Pressure drop shall be checked a minimum of once per day, and the date, time, and measurement shall be recorded.

D. Recordkeeping and Reporting

1. The owner/operator shall maintain records of the daily pressure drop measurement of the baghouse.

2. 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.
3. 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.

4. 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.

5. 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.

E. 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. There shall be no bypassing of the air pollution control equipment at any time.
4. A Visolite or similar leak detection test shall be conducted prior to the initial startup and operation, when plant operations are resumed after winter shutdown and every 90 days during the operating season.
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 No. 335 issued for the installation of the Barber-Greene Model CF-135 baghouse is revoked. This revocation will become effective from the date of issuance of this permit.

F. 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 facility. The facility 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 was 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.