

3 September 2008

Mr. Nick Sharp  
Freedom Yachts  
305 Oliphant Avenue  
Middletown, RI 02842

Dear Mr. Sharp:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your request for the installation of process equipment at your 305 Oliphant Avenue facility in Middletown.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval No. 2039).

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

Sincerely,

Douglas L. McVay  
Associate Supervising Engineer  
Office of Air Resources

cc: Middletown Building Official  
Stacey McFadden, LFR

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

MINOR SOURCE PERMIT

*FREEDOM YACHTS*

APPROVAL NO. 2039

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

*Freedom Yachts*

---

For the following:

*The installation of a spray booth for wood coating operations related to boat manufacturing.*

---

---

---

---

---

---

Located at: *305 Oliphant Avenue, Middletown*

---

---

**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 *Freedom Yachts* 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

**FREEDOM YACHTS**

APPROVAL NO. 2039

A. Emission Limitations

1. Volatile Organic Compound (VOC) Emission Limitations

- a. The total quantity of volatile organic compound emissions discharged to the atmosphere from all operations, for the entire facility, shall not exceed 4,000 pounds per calendar month, based upon a 12-month rolling average.

2. Hazardous Air Pollutant (HAP) and Air Toxic Emission Limitations

- a. The total quantity of HAP emissions discharged to the atmosphere from all operations, for the entire facility, shall not exceed 1,500 pounds of any combination of HAPs per calendar month, based upon a 12-month rolling average.
- b. The emissions of listed toxic air contaminants discharged to the atmosphere from the entire facility shall not exceed the limitations in Table 1. The limitations shown in pounds per year are calculated on a 12-month rolling average basis.
- c. The total quantity of emissions discharged to the atmosphere from all operations, for any listed toxic air contaminant not identified in Table 1, shall not exceed the minimum quantity for that contaminant as specified in Appendix A of Air Pollution Control Regulation No. 9. Emissions from activities exempted from the provisions of APC Regulation No. 22 in subsection 22.2.2 are not included in this limitation.

B. Operating Requirements

1. High Volume Low Pressure (HVLP) spray guns shall be used for surface coating operations in the spray booth.
2. The spray booth shall be equipped, at all times, with overspray filter media that treats all exhausted air prior to discharge to the atmosphere.

3. A gauge shall be installed and maintained to indicate the static pressure differential across the overspray filter media.
4. All materials containing VOC shall be stored in containers that are closed at all times except when material is being added or removed.

C. Recordkeeping and Reporting

1. The owner/operator shall maintain the following records on a monthly basis:
  - a. The name, identification number and amount used of each wood coating, as applied; and,
  - b. The name, identification number and amount of each material containing VOC and/or HAP used at the facility; and,
  - c. The mass of VOC and HAP per volume (excluding water and exempt compounds), as applied, for each material used; and,
  - d. A certified product data sheet (CPDS) showing the VOC and VHAP content of each finishing material, thinner, adhesive and washoff material used at the facility; and,
  - e. The type and amount of solvent used as thinners and in cleaning operations.
2. The owner/operator shall, on a monthly basis, no later than 10 days after the first of the month, determine the total quantity of VOC discharged to the atmosphere from all operations for the entire facility. Monthly and 12-month rolling averages shall be calculated. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.
3. The owner/operator shall notify the Office of Air Resources in writing, within 15 days of the determination, whenever the total quantity of VOCs discharged to the atmosphere from all operations, for the entire facility exceeds 4,000 pounds per calendar month, based upon a 12-month rolling average.
4. The owner/operator shall, on a monthly basis, no later than 10 days after the first of the month, determine the total quantity of HAPs discharged to the atmosphere from all operations, for the entire facility. Monthly and 12-month rolling averages shall be calculated. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.

5. The owner/operator shall notify the Office of Air Resources in writing, within 15 days of the determination, whenever the total quantity of HAPs discharged to the atmosphere from all operations, for the entire facility exceeds 1,500 pounds of any combination of HAPs per calendar month, based upon a 12-month rolling average.
6. The owner/operator shall determine, on a monthly basis, no later than 10 days after the first of the month, the total quantity of each listed toxic air contaminant in Table 1 discharged to the atmosphere from the entire facility. Hourly, daily, monthly and 12-month rolling averages shall be calculated and used for comparison with applicable emission limitations. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.
7. The owner/operator shall notify the Office of Air Resources in writing, within 15 days of the determination, whenever the total quantity of a listed toxic air contaminant, discharged to the atmosphere from the entire facility, exceeds the limitations in Table 1. For the purposes of the Table 1 listed toxic air contaminants, the following notification timelines apply:
8. The owner/operator shall determine, on a monthly basis, no later than 10 days after the first of the month, the total quantity of each listed toxic air contaminant discharged to the atmosphere from the entire facility not identified in Table 1. Monthly and 12-month rolling averages shall be calculated. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.
9. The owner/operator shall notify the Office of Air Resources in writing whenever the total quantity of a listed toxic air contaminant, discharged to the atmosphere from the entire facility not identified in Table 1, exceeds the minimum quantity for that contaminant as specified in Appendix A of Air Pollution Control Regulation No. 9. Written notification is required within 15 days of the determination.
10. The owner/operator shall notify the Office of Air Resources in writing of the actual date of startup of the spray booth within 15 calendar days after the startup date.
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 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.

13. 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.

14. 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.

D. 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 reasonable 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. The emission and dispersion characteristics of all sources of listed toxic air contaminants from the facility shall be consistent with the parameters used in the air quality modeling to demonstrate that the emissions of each listed toxic air contaminant from the facility do not cause an impact, at or beyond the property line of the facility, which exceeds the Acceptable Ambient Level for that substance. 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 added to this permit to ensure compliance with Air Pollution Control Regulation No. 22.

PCMIN-FREEDOMYACHTS 08

**Table 1. Emission Limitations**

Pollutant	Limitation		
	pounds/hour	pounds/day	pounds/year
Acetone	168	4,032 <sup>a</sup>	
Ethylbenzene		168	
Ethylene glycol monoethyl ether acetate	2.54		
Formaldehyde	1.27	16 <sup>b</sup>	16 <sup>c</sup>
1,6-Hexamethylene diisocyanate		0.30	83.4
Styrene	55.9	168	13,691 <sup>d</sup>
Toluene	11.2	67.1	5,705 <sup>e</sup>
Xylene	11.2	269 <sup>f</sup>	3,691 <sup>g</sup>

<sup>a</sup> Hourly limit x 24 hrs/day (4,032) is more stringent than the daily limit back-calculated from the AAL (5,029)

<sup>b</sup> The potential to emit (16) is more stringent than the daily limit back-calculated from the AAL (60.9)

<sup>c</sup> The potential to emit (16) is more stringent than the annual limit back-calculated from the AAL (222)

<sup>d</sup> The potential to emit (13,691) is more stringent than the annual limit back-calculated from the AAL (30,595)

<sup>e</sup> The potential to emit (5,705) is more stringent than the annual limit back-calculated from the AAL (91,785)

<sup>f</sup> Hourly limit x 24 hrs/day (269) is more stringent than the daily limit back-calculated from the AAL (503)

<sup>g</sup> The potential to emit (3,691) is more stringent than the annual limit back-calculated from the AAL (30,595)