

19 July 2013

Edward Sciaba, Jr
Rhode Island Recycled Metals
434 Allens Avenue
Providence, RI 02903

Dear Mr. Sciaba:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for the installation of air pollution control equipment at your 434 Allens Avenue, Providence facility.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval No. 2217).

If there are any questions concerning this permit, please contact me at 222-2808, extension 7415.

Sincerely,

Ruth A. Gold
Principal Air Quality Specialist
Office of Air Resources

cc: Providence Building Official

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

MINOR SOURCE PERMIT

RHODE ISLAND RECYCLED METALS

APPROVAL NO. 2217

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

Rhode Island Recycled Metals

For the following:

Installation of a Centrovventilazione Dust Collection system, including a cyclone, centrifugal fan and wet scrubber, Model No. CV-SB150-1L, to control emissions from a Drake Hammer Mill shredder system.

Located at: *434 Allens Ave., Providence, RI (in shredder building)*

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 *Rhode Island Recycled Metals* 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.

Douglas L. McVay, 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

RHODE ISLAND RECYCLED METALS

APPROVAL NO. 2217

A. Emission Limitations

1. Particulate Matter (PM)

Particulate matter generated from the shredding process shall be captured, contained, and routed to the Model CV-SB150-1L Centrovventilazione Dust Collection system for treatment. Particulate matter from the process shall be reduced by 98.75% or greater before discharge to the atmosphere.

2. Opacity

There shall be no visible emissions from the scrubber exhaust. 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.

3. Volatile Organic Carbons (VOCs)

The total quantity of volatile organic carbon emissions discharged to the atmosphere from the Model CV-SB150-1L Centrovventilazione Dust Collection system shall not exceed 8167 pounds per calendar month based upon a 12 month rolling average.

B. Operating Requirements

1. All reasonable precautions shall be taken to prevent visible, fugitive emissions from any of the equipment.

2. The owner/operator shall not shred any item unless all fluids have been removed. This includes, but is not limited to, fuel, motor oil, antifreeze, transmission fluid and brake and power steering fluid.

3. The owner/operator shall not shred any item that contains CFC/HCFC unless the refrigerant has been removed. Refrigerants removed on-site shall be removed using certified equipment and must be properly disposed of in accordance with federal regulations (40 CFR Part 82).

4. The owner/operator shall not shred any automobile unless all mercury switches have been removed from the automobile.
5. The owner/operator shall not shred any automobile unless the battery has been removed from the automobile.

C. Monitoring Requirements

1. The pressure drop across the dry cyclone separator shall be monitored continuously and checked a minimum of once per day whenever the control device is operating, and the date, time and measurement shall be recorded.
2. The pressure drop across the wet scrubber shall be monitored continuously and checked a minimum of once per day whenever the control device is operating, and the date, time and measurement shall be recorded.
3. The owner/operator shall strictly adhere to the maintenance and inspection requirements provided by the manufacturer as found in the manufacturers Installation and Maintenance Manual, as submitted with the application for approval.

D. Performance Testing

1. Within 180 days of start up of the Model CV-SB150-1L Centrovventilazione Dust Collection system, performance testing shall be conducted to demonstrate compliance with all applicable emission limitations. Emissions testing shall be conducted for particulate matter, particulate matter less than 10 microns in diameter, and volatile organic compounds.
2. A stack testing protocol shall be submitted to the Office of Air Resources at least 60 days prior to the performance of any stack tests. The owner/operator shall provide the Office of Air Resources at least 60 days prior notice of any stack test.
3. All test procedures used for emissions testing shall be conducted in accordance with Appendix A of 40 CFR 60 or another method approved by the Office of Air Resources and U.S. Environmental Protection Agency (EPA) prior to the performance of any emissions tests.
4. The owner/operator shall install any and all test ports or platforms necessary to conduct the required testing, provide safe access to any platforms and provide the necessary utilities for sampling and testing equipment.
5. All testing shall be conducted under operating conditions deemed acceptable and representative for the purposes of assessing compliance with the applicable emissions limitations.
6. A final report of the results of stack testing shall be submitted to the Office of Air Resources no later than 60 days following completion of testing.

7. All stack testing must be observed by the Office of Air Resources or its authorized representative to be considered acceptable, unless the Office of Air Resources provides authorization to the owner/operator to conduct the testing without an observer present.

E. Recordkeeping and Reporting

1. The owner/operator shall maintain records of the daily pressure drop measurements across the dry cyclone separator and the wet scrubber.
2. The owner/operator shall maintain records of the date and amount of dust collected each time the hopper on the cyclone and the filter bags on the wet scrubber are emptied.
3. The owner/operator shall maintain records of all maintenance and inspection data. Such records shall include:
 - a. The date, place and time of the inspection;
 - b. Person conducting the inspection;
 - c. Technique or method used;
 - d. Operating conditions during the inspection;
 - e. Results of the inspection; and
 - f. Any maintenance action taken.
4. The owner/operator shall, on a monthly basis, no later than 5 days after the first of the month, determine the total quantity of VOC discharged to the atmosphere from the entire facility. 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, whenever the total quantity of VOC discharged to the atmosphere from the entire facility exceeds 8,167 pounds per calendar month (12-month rolling average).
6. The owner/operator shall notify the Office of Air Resources, in writing, of the date of actual initial start-up of the Centrovilazione Dust Collection system no later than fifteen days after such date.
7. 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.

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:
 - Change the representation of the facility in the application.
 - Alter the applicability of any state or federal air pollution rules or regulations.
 - Result in the violation of any terms or conditions of this permit.
 - Qualify as a modification under APC Regulation No. 9.

Such notification shall include:

- a. Information describing the nature of the change.
- b. Information describing the effect of the change on the emission of any air contaminant.
- c. 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. 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.
10. All records required as a condition of 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.

F. Other Permit Conditions

1. To the extent consistent with the requirements of this approval 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 dated 6 February 2013.
2. There shall be no bypassing of the air pollution control equipment at any time.
3. 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.
4. At all times, including periods of startup, shutdown and malfunction, the permittee 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.

G. 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 Centrovventilazione Dust Collection system. 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 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.