

26 August 2014

Mr. Xavier Vargas
Plant Manager
Honeywell Safety Products USA, Inc.
10 Thurber Boulevard
Smithfield, RI 02917

Dear Mr. Vargas:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for the installation of process equipment at your 10 Thurber Boulevard, Smithfield facility.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval No. 2266).

If there are any questions concerning this permit, please contact me by phone at 401-222-2808, extension 7028 or by email at aleida.whitney@dem.ri.gov.

Sincerely,

Aleida M. Whitney
Senior Air Quality Specialist
Office of Air Resources

cc: Smithfield Building Official
Suzanne Persyn, ENVIRON

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

MINOR SOURCE PERMIT

HONEYWELL SAFETY PRODUCTS USA, INC.

APPROVAL NO. 2266

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

Honeywell Safety Products USA, Inc.

For the following:

The operation of fifty-eight (58) injection molding machines used in the manufacture of plastic personal protective eyewear, face shields and eye wash station components

Located at: *10 Thurber Boulevard, Smithfield*

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 *Honeywell Safety Products USA, 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.

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

HONEYWELL SAFETY PRODUCTS USA, INC.

APPROVAL NO. 2266

A. Emission Limitations

1. Acrylonitrile

- a. The total quantity of acrylonitrile emissions discharged to the atmosphere from the entire facility shall not exceed 1.29 pounds per hour; and,
- b. The total quantity of acrylonitrile emissions discharged to the atmosphere from the entire facility shall not exceed 8.52 pounds in any consecutive 12-month period.

2. Volatile Organic Compounds (VOCs)

- a. The total quantity of VOC emissions discharged to the atmosphere from the entire facility shall not exceed 8167 pounds of VOC per calendar month based upon a 12-month rolling average.

3. Hazardous Air Pollutants (HAPs)

- a. The total quantity of HAP emissions discharged to the atmosphere from the entire facility shall not exceed 1500 pounds of any one (1) HAP or 4000 pounds of any combination of HAPs per calendar month based upon a 12 month rolling average. Hazardous Air Pollutant shall mean an air pollutant which has been listed pursuant to Section 112(b) of the Clean Air Act Amendments of 1990.

4. Listed Toxic Air Contaminants

- a. The total quantity of emissions discharged to the atmosphere from the entire facility, of any listed toxic air contaminant, with the exception of isopropyl alcohol, toluene and acrylonitrile shall not exceed the minimum quantity for that contaminant as specified in Appendix A of Air Pollution Control Regulation No. 9, during a calendar year. Emissions from activities exempted from the provisions of APC Regulation No. 22 in subsection 22.2.2 are not included in this limitation.

5. Odors

- a. Any air contaminant or combination of air contaminants discharged to the atmosphere from the facility shall not create an objectionable odor beyond the property line of this facility. Odor evaluations shall be conducted according to the provisions of Air Pollution Control Regulation No. 17.

B. Operating Requirements

1. The owner/operator shall limit the total quantity of Acrylonitrile-Butadiene-Styrene (ABS) resin used in the entire facility to 1,000,000 pounds or less for any consecutive 12-month period.

C. Record Keeping and Reporting

1. The owner/operator shall maintain all of the following information each month:
 - a. The name, identification number and amount (in pounds) of each ABS resin or colorant used in the injection molding machines at the facility.
 - b. A material safety data sheet (MSDS) or equivalent for each resin or colorant used in the injection molding machines at the facility.
 - c. Documentation identifying the VOC, HAP and Listed Toxic Air Contaminant emission factor for each resin or colorant used in the injection molding machines at the facility. Where the manufacturer does not specify these emission factors, documentation identifying other published emission factors for the resin may be used.
2. On an annual basis, the owner/operator shall maintain the name, identification number and amount (in pounds) of each resin or colorant used in the injection molding machines at the facility.
3. The owner/operator shall, on a monthly basis, no later than the last day of the following month, determine the total quantity of acrylonitrile discharged to the atmosphere from the entire facility. Hourly emission averages shall be calculated. Hourly emission averages shall be calculated based on monthly emissions and monthly facility operating hours. These hourly averages shall be used for comparison to emission limitations. 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.
4. The owner/operator shall notify the Office of Air Resources in writing, within 15 days of determining that the total quantity of acrylonitrile emissions discharged to the atmosphere from the entire facility exceeds 1.29 pounds per hour or 8.52 pounds in any consecutive 12-month period.

5. The owner/operator shall, on a monthly basis, no later than 15 days after the first of the month, determine the total quantity of ABS resin used in the entire facility for 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.
6. The owner/operator shall notify the Office of Air Resources in writing, within 15 days of determining that the total quantity of ABS resin used at the entire facility exceeds 1,000,000 pounds for any consecutive 12-month period.
7. The owner/operator shall, on a monthly basis, no later than the last day of the following month, determine the total quantity of VOC discharged to the atmosphere from all operations at 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.
8. The owner/operator shall notify the Office of Air Resources in writing, within 15 days of determining that the total quantity of VOCs discharged to the atmosphere from all operations at this facility exceeds 8,167 pounds per calendar month (12-month rolling average).
9. The owner/operator shall, on a monthly basis, no later than the last day of the following month, determine the total quantity of HAP emissions discharged to the atmosphere from all operations at 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.
10. The owner/operator shall notify the Office of Air Resources in writing, within 15 days of determining that the total quantity of HAP emissions discharged to the atmosphere from all operations at this facility exceeds 1,500 pounds of any one (1) HAP or 4,000 pounds of any combination of HAPs per calendar month (12-month rolling average).
11. The owner/operator shall, for each calendar year, determine the total quantity of each listed toxic air contaminant in Appendix A of Air Pollution Control Regulation No. 9 discharged to the atmosphere from all operations at the entire facility excluding isopropyl alcohol, toluene and acrylonitrile. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.
12. The owner/operator shall notify the Office of Air Resources in writing, within 15 days of determining that the total quantity of emissions discharged to the atmosphere from the entire facility, of any listed toxic air contaminant excluding isopropyl alcohol, toluene and acrylonitrile, exceeds the minimum quantity for that contaminant as specified in Appendix A of Air Pollution Control Regulation

No. 9. In accordance with Air Pollution Control Regulation No 22, this notification shall be included in the annual air pollution inventory.

13. 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.
14. 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.

15. Deviations from permit conditions shall be reported, in writing, within five (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 preventative measure taken.
16. 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. The emission and dispersion characteristics of all sources of acrylonitrile at the facility shall be consistent with the parameters used in the air quality modeling to

demonstrate that the emissions of acrylonitrile 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 revised and/or added to this permit to ensure compliance with Air Pollution Control Regulation No. 22.

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, investigation 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 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.