

20 January 2015

Kenneth Barthelemy
Vice-President of Production & Engineering
Teknicote, Inc.
10 New Road
Rumford, RI 02916

Dear Mr. Barthelemy:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your minor source permit application for the installation of process equipment at your facility, located 10 New Road, Rumford, RI.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval Nos. 2274 & 2275).

Any source with the potential to emit greater than major source thresholds as defined under Air Pollution Control Regulation No. 29, "Operating Permits" is subject to the Operating Permit Program. Your facility is currently subject to the Operating Permit Program as an Emissions Cap Source, with allowable emissions restricted to below the major source threshold. An emissions cap means any emission limitation or physical or operational limitation, imposed in a federally enforceable document that establishes the maximum quantity of emissions which may be released from a stationary source. The Office of Air Resources considers this minor source permit an emissions cap. Air Pollution Control Regulation No. 28, "Operating Permit Fees" requires stationary sources with an emissions cap to pay an annual compliance/assurance fee of \$350.00. Notification concerning the payment of this fee will be mailed to you during the fall of this year.

If there are any questions concerning this permit, please contact me at 401-222-2808, extension 7415 or at stephen.stamand@dem.ri.gov.

Sincerely,

Stephen G. St. Amand
Air Quality Specialist
Office of Air Resources

cc: East Providence Building Official
Lew Reed, P.E. – Alliance Environmental Group

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

MINOR SOURCE PERMIT

TEKNICOTE, INC

APPROVAL NOs. 2274 & 2275

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

Teknicote, Inc.

For the following:

Installation of surface coating operations (Approval No. 2274) and the installation of an

Amiberica Inc., Pyro-Strip fluidized hot sand stripper, Model No. 604230 (Approval No. 2275).

Located at: *10 New Road, Rumford, Rhode Island*

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 *Teknicote, 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

TEKNICOTE, INC.

APPROVAL NOs. 2274 & 2275

A. Emission Limitations

1. Volatile Organic Compound (VOC) Emission Limitations

- a. The total quantity of VOC emissions discharged to the atmosphere from all surface coating operations shall not exceed 1,666 pounds in any one calendar month.
- b. If the emission limitation in A.1.a is exceeded, the emission limitations specified in Air Pollution Control Regulation 19, Subsection 19.3.1 shall immediately apply.
- c. The total quantity of VOC emissions discharged to the atmosphere from the entire facility shall not exceed 2,500 pounds of VOC per calendar month based upon a 12-month rolling average.

2. Hazardous Air Pollutant (HAP) Emission Limitations

The total quantity of HAP emissions discharged to the atmosphere from all operations shall not exceed 750 pounds of any one HAP or 2,000 pounds of any combination of HAPs per calendar month based upon a 12-month rolling average. HAP shall mean an air pollutant which has been listed pursuant to Section 112(b) of the Clean Air Act Amendments of 1990.

3. Listed Toxic Air Contaminants Emission Limitations

The total quantity of emissions discharged to the atmosphere from the entire facility, of any listed toxic air contaminant shall not exceed the minimum quantity for that contaminant as specified in Appendix A of Air Pollution Control Regulation No. 9, based upon a 12-month rolling average. Emissions from activities exempted from the provisions of APC Regulation No. 22 in subsection 22.2.2 are not included in this limitation.

4. Opacity

Visible emissions from the fluidized sand stripper exhaust flue shall not exceed 10% opacity (six-minute average). Where the presence of uncombined water is

the only reason for failure to meet the requirements of this condition, such failure shall not be a violation of this permit.

5. Odors

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. High Volume Low Pressure (HVLV), or equivalent, 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.
5. The owner/operator shall operate the fluidized sand stripper in accordance with the manufacturer's operating procedures.
6. The owner/operator shall always operate the fluidized sand stripper's afterburner whenever material is being processed.
7. The afterburner shall be equipped with a temperature controller and indicator.
8. The temperature controller shall be set to maintain the afterburner temperature at 1400°F or greater.
9. The thermocouple shall be located as close to the afterburner exit as possible.
10. Material shall not be loaded into the fluidized sand stripper unless the afterburner temperature is at or above 1400°F.
11. The fluidized sand stripper's lid shall remain closed whenever material is being processed.

C. Continuous Monitors

1. The afterburner temperature shall be monitored continuously. The temperature shall be checked once during each stripping cycle and the date, time and measurement shall be recorded.

D. Record Keeping and Reporting

1. The owner/operator shall maintain the following record whenever the fluidized sand stripper is operated.
 - a. The operating temperature measurement of the afterburner.
2. The owner/operator shall collect and record all of the following information each month:
 - a. The name, identification number and amount used of each coating, as applied; and,
 - b. The mass of VOC per volume (excluding water and exempt compounds), as applied, for each coating used; and,
 - c. The mass of HAP per volume of each coating used, as applied; and,
 - d. The type and amount of solvent used for diluents and cleanup operations.
3. The owner/operator shall, on a monthly basis, no later than 15 days after the first of the month, determine the total quantity of VOC discharged to the atmosphere from all surface coating operations. 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 volatile organic compound emissions discharged to the atmosphere from all surface coating operations exceeds 1,666 pounds in any one calendar month.
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 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.
6. 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 2,500 pounds per calendar month (12-month rolling average).

7. The owner/operator shall, on a monthly basis, no later than 15 days after the first of the month, determine the total quantity of HAP emissions 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.
8. 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 for the entire facility exceeds 750 pounds of any one HAP or 2,000 pounds of any combination of HAPs per calendar month based upon a 12-month rolling average.
9. The owner/operator shall, on a monthly basis, no later than 15 days after the first of the month, determine the total quantity of each listed toxic air contaminant in Appendix A of the Air Pollution Control Regulation No. 9 discharged to the atmosphere from the entire facility. Monthly and 12-month rolling averages shall be calculated. The 12-month rolling average shall be used for comparison with emission limitations. 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 of emissions discharged to the atmosphere from the entire facility, of any listed toxic air contaminant exceeds the minimum quantity for that contaminant as specified in Appendix A of Air Pollution Control Regulation No. 9.
11. 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.
12. The owner/operator shall notify the Office of Air Resources in writing, of the actual date of startup of the fluidized sand stripper within 15 calendar days after the startup date.
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. 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.
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.

E. Malfunctions

1. 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 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 actions 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 time 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 fluidized sand stripper in the event of a malfunction of the fluidized sand stripper that results in, or that could result in, emissions in excess of the permit limits. The fluidized sand stripper shall remain shut down until malfunction has been identified and corrected.
4. At all times, including periods of startup, shutdown and malfunctions, the owner/operator shall, to the extent practicable, maintain and operate the fluidized sand stripper in a manner consistent with good air pollution control practice for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this permit have been achieved. 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. This permit contains emission limitations and recordkeeping and reporting requirements relating to Volatile Organic Compounds (VOCs). A VOC is defined in the Office of Air Resources' General Definitions Regulation. Any organic compound not excluded from the definition is considered a VOC under this permit.