

State of Rhode Island
Department of Environmental Management
Office of Air Resources

NOTICE OF PUBLIC COMMENT PERIOD

The Office of Air Resources offers an opportunity for public comment regarding its proposal to issue an Emissions Cap for the following stationary source:

Safety-Kleen Systems, Inc., 167 Mill Street, Cranston, RI 02905

Emissions Cap No. 123-2024 for Quality Spraying Technologies, Inc. is being issued to enforce facility-wide limitations on the emissions of Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs). The emissions cap will also reflect the recordkeeping and reporting requirements associated with these emission limitations.

“Operating Permits”, 250-RICR-120-05-29 contains provisions to allow sources to apply for an emissions cap. An emissions cap must be federally enforceable and include some combination of production and/or operational limitations to ensure that emissions are limited by quantifiable and enforceable means. An emissions cap relieves the stationary source from the requirement to obtain an operating permit.

The public comment period for the emissions cap will begin today and continue until 20 March 2024. A virtual public hearing for interested persons will be held if requested by 10 or more persons, or by a governmental subdivision or agency or by an association having not less than 10 members. Any interested person may request that a public hearing be held.

Written comments, to be considered part of the record, or requests for a public hearing must be submitted during the public comment period until 4:00 PM, 20 March 2024, at which time the public comment period will close. Please address written comments or hearing requests to:

Aleida Whitney
Department of Environmental Management
Office of Air Resources, Room 330
235 Promenade Street
Providence, RI 02908-5767

The draft emissions cap is available for inspection at the Office of Air Resources, 235 Promenade Street, Providence RI from 8:30am to 4:00pm. Please contact the Office of Customer & Technical Assistance to schedule a file review at DEM.filereview@dem.ri.gov, or email Aleida Whitney at Aleida.Whitney@dem.ri.gov to request the documents electronically. For more information, contact Aleida Whitney at (401) 537-4401 (TTY 711).

Signed this 16th day of February 2024.



Laurie Grandchamp, P.E., Administrator
Office of Air Resources



STATE OF RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES

EMISSIONS CAP PERMIT

SAFETY-KLEEN SYSTEMS, INC.

Draft EMISSIONS CAP NO. 123-2024

Pursuant to the provisions of “**Operating Permits**”, 250-RICR-120-05-29, this emissions cap permit is issued to:

Safety-Kleen Systems, Inc.

This emissions cap permit shall be effective from the date of its issuance and shall remain in effect until revoked by or surrendered to the Department.

This emissions cap permit does not relieve *Safety-Kleen Systems, Inc.* from compliance with applicable state and federal air pollution control rules and regulations. The design, construction and operation of this facility shall be subject to the attached operating requirements and conditions.

This emission cap shall be considered an enforceable document as the term is used in “General Definitions Regulation”, 250-RICR-120-0(A)(17).

Laurie Grandchamp, P.E., Administrator
Office of Air Resources
Date of issuance: XX/XX/2024

**STATE OF RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES**

Operating Requirements and Conditions

SAFETY-KLEEN SYSTEMS, INC.

Draft Emissions Cap No. 123-2024

A. Emission Limitations

1. The total quantity of Volatile Organic Compounds (VOCs) discharged to the atmosphere from the entire facility shall not exceed 98,000 pounds in any consecutive 12-month period.
2. Hazardous Air Pollutant (HAP)

The total quantity of HAP emissions discharged to the atmosphere from all operations, from the entire facility, shall not exceed 1,500 pounds of any one (1) HAP or 4,000 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 42 U.S.C. § 7412(b) (CAA § 112(b)).

B. Recordkeeping Requirements

1. The permittee shall, on a monthly basis, no later than 15 days after the first of the month, determine the total quantity of VOC emissions discharged to the atmosphere from all operations for the entire facility for the previous 12-month period. The permittee shall keep records of this determination and provide such records to the Office of Air Resources upon request.
2. The permittee 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 permittee shall keep records of this determination and provide such records to the Office of Air Resources upon request.
3. All records required in this emissions cap 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.

C. Reporting Requirements

1. The permittee shall notify the Office of Air Resources in writing, within 15 days of determining that the total quantity of VOC emissions discharged to the atmosphere from all operations, from the entire facility, exceeds 98,000 pounds in any consecutive 12-month period.

2. The permittee 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 1,500 pounds of any one HAP or 4,000 pounds of any combination of HAPs per calendar month based upon a 12-month rolling average.
3. The permittee shall notify the Office of Air Resources of any anticipated noncompliance with the terms of this emissions cap or any other applicable air pollution control rules and regulations.
4. The permittee 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 250-RICR-120-05-9.

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.
5. The permittee shall notify the Office of Air Resources, in writing, of any noncompliance with the terms of this emissions cap within 15 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.

D. Other Conditions

1. 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.

2. The Office of Air Resources may reopen and revise this emission cap if it determines that:
 - a. A material mistake was made in establishing the operating restrictions; or
 - b. Inaccurate emission factors were used in establishing the operating restrictions; or
 - c. Emission factors have changed as a result of stack testing or emissions monitoring; or
 - d. Revisions are necessary due to additional applicable requirements pursuant to state or federal law or from any regulatory agency.