

7 April 2004

Mr. Guy Desaulniers  
Health, Safety & Environmental Coordinator  
Honeywell Sensing and Control  
245 Railroad Street  
Woonsocket, RI 02895

Dear Mr. Desaulniers:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your request for a minor source permit for your facility located at 245 Railroad Street in Woonsocket, RI.

Enclosed is a minor source permit issued pursuant to our review of your request (Approval No. 1794).

I can be reached at 222-2808, extension 7011 if there are any questions.

Sincerely,

Douglas L. McVay  
Associate Supervising Engineer  
Office of Air Resources

cc: Woonsocket Building Official

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

MINOR SOURCE PERMIT

*HONEYWELL SENSING AND CONTROL*

APPROVAL NO. 1794

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

*Honeywell Sensing and Control*

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For the following:

*The installation and operation of two production lines relocated from the Pawtucket facility;*

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*the Precision Thermostat (Approval No. 1794) and the Hi Reliability Probes.*

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Located at: *245 Railroad Street, Woonsocket*

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**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 Sensing and Control* 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.**

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Stephen Majkut, Chief  
Office of Air Resources

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Date of issuance

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

Permit Conditions and Emission Limitations

**HONEYWELL SENSING AND CONTROL**

**APPROVAL NO. 1794**

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 conducted at the facility shall not exceed 98,000 pounds in any given consecutive 12-month period.

2. Hazardous Air Pollutant (HAP) Emission Limitations

- a. The total quantity of any one (1) HAP discharged to the atmosphere from all operations conducted at the facility shall not exceed 18,000 pounds in any given consecutive 12-month period.
- b. The total quantity of all HAPs discharged to the atmosphere from all operations conducted at the facility shall not exceed 48,000 pounds in any consecutive 12-month period.

B. Operating Requirements

The following requirements are applicable to all organic solvent cleaning operations. Organic solvent cleaning shall have the meaning given to the term in Air Pollution Control Regulation No. 36.

1. Equipment covers and dipping or rotating baskets must be constructed of nonporous or nonabsorbent material. Covers must form a tight seal with the sides of the solvent cleaning machine and have no gaps or holes.
2. When the solvent cleaning machine cover is open, drafts at the same elevation as the tank lip must not be greater than 40 m/min. (130 ft/min.) when measured 1 to 2 meters (3 to 7 feet) upwind.
3. Leaks must be repaired immediately or the solvent cleaning unit shut down.

4. Equipment used in solvent cleaning must display a conspicuous summary of proper operating procedures consistent with minimizing emissions of organic solvents.
5. Any solvent spray must be a solid, fluid stream which is delivered at a pressure no greater than 10 pounds per square inch (psi) and which does not cause excessive splashing.
6. Spills shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the specifications in Condition B.12.
7. No porous or absorbent materials, such as sponges, fabrics, wood, or paper products, shall be cleaned in the solvent cleaning machine.
8. Parts baskets or parts shall be drained under the cover and shall not be removed from the cleaning machine for at least 15 seconds or until dripping ceases and the pieces are visually dry, whichever is longer.
9. Parts having cavities or blind holes shall be tipped or rotated while draining before being removed from the vapor zone.
10. Parts shall be oriented for best drainage.
11. When solvent is added to or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
12. Solvent, waste solvent, still bottoms, and sump bottoms must be stored in covered containers and waste solvent transferred or disposal must allow less than 20 percent of the waste solvent (by weight) to evaporate into the atmosphere.
13. The solvent cleaning machine and related air pollution control equipment shall be maintained as recommended by the manufacturer of the equipment.
14. Operators must receive training in proper solvent cleaning procedures and, if requested by representatives of the Office of Air Resources or the EPA during an inspection, must complete and pass the applicable sections of the test on those procedures in Appendix A of Air Pollution Control Regulation No. 36.

C. Requirements for Batch Cold Cleaning Operations

The following requirements are applicable to all batch cold cleaning operations. Batch cleaning and cold cleaning shall have the meaning given to the terms in Air Pollution Control Regulation No. 36.

1. Cleaning machines shall be equipped with an attached cover that can be operated easily with one hand. Covers must be closed at all times except during parts entry and removal. If the cold cleaning machine is equipped with a lip exhaust, the cover shall be located below the lip exhaust.
2. The solvent sump of a remote-reservoir batch cold cleaning machine must be equipped with a tight fitting cover that is kept closed at all times except during the cleaning of parts.
3. One of the following techniques shall be used to control solvent emissions from batch cold cleaning operations:
  - a. A freeboard ratio greater than or equal to 0.75; or
  - b. Water cover of at least four inches in depth if the solvent is insoluble in and heavier than water; or
  - c. Another system of equivalent control that is approved by the Director and the EPA. Requests for equivalency determinations shall be submitted in accordance with the requirements in subsection 36.5.3(c) of Air Pollution Control Regulation No. 36.
4. If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard zone of the cold cleaning machine.
5. When an air- or pump-agitated solvent bath is used, the agitator shall be operated so that a rolling motion of the solvent is produced and splashing against the tank or parts being cleaned does not occur.
6. The height of solvent in a batch cold cleaner shall not exceed the manufacturer's fill-line for that machine.
7. All containers used to store VOC-containing materials must be equipped with a tight fitting lid which is kept closed when the container is not in use so as to minimize VOC emissions to the atmosphere.

D. Recordkeeping and Reporting

1. The owner/operator shall, on a monthly basis, no later than 5 business days after the first of the month, determine the total quantity of VOC discharged to the atmosphere from all operations conducted at the facility. This provision shall become effective immediately upon issuance of the permit. All purchase orders, invoices, and other documents to support the determination of actual volatile

organic compound emissions shall be maintained and be made available to the Office of Air Resources upon request.

2. The owner/operator shall notify the Office of Air Resources in writing, within 15 days, whenever the quantity of VOC discharged to the atmosphere from all operations conducted at the facility exceeds 98,000 pounds in any given consecutive 12-month period.
3. The owner/operator shall, on a monthly basis, no later than 5 business days after the first of the month, determine the total quantity of each HAP discharged to the atmosphere from all operations conducted at the facility. 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, whenever the total quantity any one HAP discharged to the atmosphere from all operations conducted at the facility exceeds 18,000 pounds in any given consecutive 12-month period.
5. The owner/operator shall notify the Office of Air Resources in writing, within 15 days, whenever the total quantity of any combination of HAPs discharged to the atmosphere from all operations conducted at the facility exceeds 48,000 pounds in any given consecutive 12-month period.
6. The owner/operator shall maintain the following records:
  - a. The name, type, and identification number of each material containing VOC and/or HAP used at the facility, including but not limited to each raw material used in the Precision Thermostat process line, the Hi Reliability Probes line, and the batch cold cleaning machines.
  - b. A material safety data sheet (MSDS) or equivalent for each material containing VOC and/or HAP used at the facility, showing the VOC and HAP content.
  - c. For each raw material used in the Precision Thermostat process line and the Hi Reliability Probes line, the VOC content in weight percent and the total weight per gallon.
  - d. For each clean-up material, each VOC component and the content in volume percent.
  - e. For each material containing VOC and/or HAP used at the facility, the quantity used and the amount of waste generated (in gallons or pounds) at the facility on a monthly basis.

- f. Training provided to operators of the batch cold cleaning machines for the lifetime of the units.
  - g. The amount and type of solvent used in each cleaning machine for each year.
  - h. For each cleaning machine, the date and type of each equipment malfunction or leak and the date the malfunction or leak is repaired.
- 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 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.
- 9. The owner/operator shall notify the Office of Air Resources in writing of any planned physical or operational change to any equipment covered under this approval 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.

10. 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, state, and local laws, the facility shall be designed, constructed, and operated in accordance with the representation of the facility in the permit application dated 24 October 2003.
2. 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.
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.